DOCUMENT RESUME

ED 367 852 CE 065 921

AUTHOR	Davies, Pat; Parry, Gareth
TITLE	Recognising Access. The Formation and Implementation of the National Framework for the Recognition of Access Courses.
INSTITUTION	National Inst. of Adult Continuing Education, Leicester (England).
SPONS AGENCY	Department of Employment, London (England). Training Enterprise and Education Directorate.; Further Education Unit, London (England).
REPORT NO	ISBN-1-872941-38-9
PUB DATE	93
NOTE	186p.
AVAILABLE FROM	National Institute of Adult Continuing Education, 21 De Montfort Street, Leicester LE1 7GE, England, United Kingdom (9.95 British pounds).
PUB TYPE	Reports - Research/Technical (143) -- Books (010)
EDRS PRICE	MF01/PC08 Plus Postage.
DESCRIPTORS	*Access to Education; Accreditation (Institutions); Adult Education; Adult Students; Educational Development; Educational Discrimination; Educational Planning; Educational Policy; Foreign Countries; Higher Education; National Programs; Program Development; *Program Implementation; *Reentry Students
IDENTIFIERS	*Access Courses (United Kingdom); United Kingdom

ABSTRACT

This book focuses on the past, present, and future of the national framework for the recognition of access courses in the United Kingdom. Chapter 1 is an introduction that discusses framework studies and framework features. Chapter 2 is a review of the bodies appointed to plan and oversee the scheme at the center, including an examination of the perspectives and perceptions of the major players. The evolution of the enterprise is reviewed in terms of four developmental stages or phases: preliminary, planning, operational, and review. Chapter 3 is an account of the implementation of the venture that is based mainly on five case studies of agencies authorized to recognize access courses on behalf of the central authorities. Topics include the following: mandate, structure, and resourcing of authorized validating agencies (AVAs); roles and relationships; quality assurance mechanisms; and curriculum issues. Chapter 4 is a concluding commentary of the character, influence, and direction of the framework. The introduction of the framework is evaluated in terms of the original purposes and principles established to guide the formation and implementation of the scheme. Appendixes include information on origins, methods, and outcomes; chronology of events, 1987-92; and brief outlines of the five case study AVAs. Contains 33 references. (YLB)

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Recognising Access

Pat Davies and Gareth Parry

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The Formation and Implementation of the National Framework for the Recognition of Access Courses

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Recognising Access

An Account of the Formation and Implementation of the National Framework for the Recognition of Access Courses

Pat Davies
&
Gareth Parry

National Institute of Adult Continuing Education

First published in 1993 by the National Institute of Adult Continuing Education for the Council for National Academic Awards and on behalf of the Steering Committee of the Evaluation Study.

This publication is the report of a project funded by the Department for Education, the Department of Employment (Training, Enterprise and Education Directorate), the Further Education Unit and the Unit for the Development of Adult Continuing Education.

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British Library Cataloguing in Publication Data
A catalogue record is available from the British Library

ISBN 1 872941 38 9

The views expressed are those of the authors and do not necessarily reflect those of the government departments and public bodies which funded the study or of NIACE.

NIACE is a company limited by guarantee, registration number 2603322
Charity number 1002775

Acknowledgements
The authors would like to thank the members of the Access Courses Recognition Group, the Consultative Committee, the Authorised Validating Agencies and the Steering Committee for the study for their co-operation and collaboration at all stages of the work. Particular thanks are due to Roseanne Benn, David Browning, Nick Hall, George Heron, Philip Jones, Sue Pedder, Bev Sand, Anne Thompson and Cynthia White.
Cover photograph courtesy Greenwich Access Project, Greenwich University

Printed in England by Biddles Ltd, Guildford

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Introduction

The formation and implementation of the national framework for the recognition of access courses has spanned a remarkable period in the history of post-compulsory education in the United Kingdom. At the beginning of the 1980s, access courses leading to higher education were a relatively new, distinctly local and largely unknown phenomenon; and identified with positive action and innovative practice at a time when opportunities for adults to enter higher education were constrained. By the beginning of the 1990s, these courses were a rapidly expanded, routinely regarded and nationally recognised part of the architecture of further and higher education; and associated with features and assumptions increasingly challenged by the contemporary drive to a mass, modular and credit-based system of post-school education and training.

Proposed in 1987 and launched in 1989, the framework of national arrangements for the recognition of access courses was one of a number of measures intended by Government to extend participation and widen access to higher education. While the original context for such a proposal was a concern about a demographic decline in student numbers and an insufficient supply of highly qualified manpower, that surrounding the subsequent development of the scheme has been one of buoyant demand, record recruitment and increased diversity of means and modes by which young and older people were able to secure entry to higher education. The operation of the framework in this dynamic environment has posed new questions about the significance and scope of the exercise, as well as new difficulties (and complexities) in the assessment of its early impact.

Although not a major episode in broad policy terms, the principles underpinning the scheme – collaboration, devolution and lightness of touch – and the relationships forged between further education and higher education and between the university and non-university parts of higher education have served to alter the language and landscape of access education. Furthermore, the attempt to develop at national

level a set of principles and relationships drawn from access practice at local level, and then to offer them back to the field as part of a regulatory framework, has had a number of consequences, not all of them anticipated by those who devised and administered the scheme.

In order to justify the designation of access courses as a normal or standard route into higher education, rather than as a means of exceptional entry, a system of quality assurance was to be introduced which would ensure parity of status and standards with other, more established pathways. At the same time, the availability of such courses was to be increased, their diversity maintained, and their philosophy respected. Future expansion, wider permeation and deeper penetration were to be contingent therefore upon legitimation and necessary regulation.

Many of the issues which confronted the framework, which shaped its identity and evolution, were the same as those which challenged the system as a whole, and in some cases they anticipated debates and developments which were to feature on the larger policy stage. Some questions, such as the role of equal opportunities and planning strategies, were to continue to command attention when their importance elsewhere was generally reduced. Other dimensions, including the adherence to minimum study hours and general entry requirements, were to prove more problematic, and increasingly idiosyncratic, as changes in curriculum design and assessment, as well as adjustments in admission policies and procedures, lessened the relevance of these notions.

Given the competing pressures which operated from within and towards the framework, and the range of interests and institutions embraced by the initiative, it was to be expected that framework guidelines would be differently received and variously interpreted. The tensions, ambiguities and uncertainties which accompanied the formation of the scheme at the centre were to be reproduced but reworked in attempts to implement the scheme at regional and local level. The result has been a mixture of models and styles of validation for access courses, a reflection of political and economic exigencies as much as longer-term educational goals or missions. The future of these arrangements and the agencies approved to conduct them, some resting on fragile foundations and several offering validation alongside other services, has become a source of speculation as well as a live element in review and evaluation.

FRAMEWORK STUDIES

The past, present and future of the national framework has been the subject of an independent evaluation study conducted at City University and funded by the Training Agency, Further Education Unit (FEU), Department of Education and Science (DES) and the Unit for the Development of Adult Continuing Education (UDACE). The research was carried out by the authors between January 1990 and August 1991. The early part of this work focused on the formation and operation of the scheme at national level. The later period, based on fieldwork undertaken in different parts of England between September 1990 and August 1991, was concerned with monitoring the implementation of the initiative at local and regional level. Both phases involved analysis of documentary sources, interviews with key participants and observation of relevant meetings and events.

An interim report *Framing Access* (Parry and Davies, 1991a) outlining the preliminary findings from the first part of the study was published by UDACE in the spring of 1991. The present publication is the final report of the evaluation study and is based on work undertaken over the whole of the research period, with an up-date of events and developments to the end of 1992. The report is organised in three main sections: a review of the bodies appointed to plan and oversee the scheme at the centre, including an examination of the perspectives and perceptions of the major players; an account of the implementation of the venture on the ground based mainly on five case studies of agencies authorised to recognise access courses on behalf of the central authorities (Birmingham Access Federation, Manchester Open College Federation, Newcastle Polytechnic and Partners, South West Access Validating Agency and, in London, Access to Learning for Adults); and a concluding commentary on the character, influence and direction of the framework. Some of this material is summarised and discussed in a sister publication *Kitemarking Access* (Parry and Davies, 1992) published by the Further Education Unit on behalf of the Department of Employment. [1]

Formative evaluation and regular feedback to participants in the scheme as well as practitioners in the field have been important features of the study. These have taken a variety of forms, ranging from open invitations to comment and preliminary reports to interested parties, through to more informal and incidental exchanges occasioned by a collaborative and participative style of fieldwork. The academic, evaluative and developmental dimensions of the research are outlined in Appendix I, together with a description of the methods and approaches employed at different points in the study.

FRAMEWORK FEATURES

The national framework for the recognition of access courses was established to increase the credibility and authority of such courses as a basis for entry to higher education. As a framework assurance it was designed to:

> *'support and extend opportunities for students' admission to higher education, whilst safeguarding the risk of erosion of standards. The purpose is to encourage staff in higher education to be more prepared to admit students from Access Courses, and students themselves to be more confident of obtaining a place. The arrangements should enable individual Access Courses to achieve a wide basis of acceptability and currency for entry to all higher education institutions' (CVCP and CNAA, 1989a: para 5).*

These arrangements relate to England, Wales and Northern Ireland. In Scotland separate arrangements were made through the Scottish Wider Access Programme (SWAP).[2]

The courses and programmes of study currently deemed to fall within the framework of national arrangements are those which seek to:

- ☐ facilitate entry to higher education
- ☐ provide mainly for mature students
- ☐ cater for individuals without conventional entry qualifications who do not feel ready to enter directly
- ☐ meet the needs of specific groups under-represented in higher education
- ☐ provide an alternative to courses offered by other educational, vocational or professional examining authorities.

Such courses provide 'a specific type of access route' and their 'special role' is 'widening participation' in higher education (CVCP and CNAA, 1992a: 7). Access courses embraced by the framework of recognition were intended to cover only part of the spectrum of alternative routes to higher education and their specificity is signified by the use of capital letters ('Access Courses') in framework publications: a convention followed in the rest of this report.

The great majority of Access Courses are provided by colleges of further education, together with a small number found in higher education establishments and adult education institutions. They can be followed full-time or part-time and they facilitate entry into a range of degree and other higher education programmes, including those in scientific, technological and professional areas. The *Access to Higher*

Education Courses Directory published in 1989 reported 577 such courses in England, Wales and Northern Ireland and these were estimated to be providing for about 11,000 students in 1989–90. By the time of the publication in 1992 of the first *Register of Recognised Access Courses to Higher Education*, the number of reported courses had risen to over 1000 and were estimated to be offering some 30,000 student places in 1991–92.

The framework of national recognition has three tiers or dimensions of operation. First, a central authority – presently an advisory group within the Higher Education Quality Council (HEQC) but previously a joint committee of the Council for National Academic Awards (CNAA) and the Committee of Vice Chancellors and Principals (CVCP). The scheme was originally developed by a Steering Committee established by the CNAA in partnership with the CVCP and this group was subsequently translated into a joint committee of the two bodies – the Access Courses Recognition Group (ACRG) – with overall responsibility for the framework. The ACRG had 14 members drawn from the (then) polytechnics, the universities and the colleges, from Access Course providers, validating bodies and local education authorities, as well as from the CVCP and the CNAA. It was funded jointly by the Polytechnics and Colleges Funding Council (PCFC) and the Universities Funding Council (UFC), and was assisted in its operational arrangements by a Consultative Committee with a larger and wider membership. The major role of the ACRG was to authorise validating agencies to approve Access Courses as an appropriate basis for admission to higher education and to undertake periodic reviews to satisfy itself as to the suitability of the criteria and the processes of validation proposed and adopted by these agencies.

The ACRG was stood down toward the end of 1992 and its formal position and authority are now vested in the HEQC, a new quality assurance organisation for the United Kingdom set up and controlled by the universities and other institutions of higher education. A Specialist Panel has replaced the former Consultative Committee and provides a register of specialist advisers to be drawn upon for inclusion in working groups to consider submissions from applicant validating agencies, to undertake periodic reviews of authorised agencies, and to advise the central authority on policy matters. Formal communication and consultation with the authorised validating agencies is arranged through a national representative organisation – the Standing Conference of Authorised Validating Agencies (SCAVA) – which has representatives nominated to the ACRG and the Specialist Panel. Responsibility for the maintenance and development of the framework is located in the Division of Credit and Access within the

HEQC where an Assistant Director is responsible for the national recognition of Access Courses.

Validation of Access Courses for the purpose of acquiring a kitemark of national recognition is devolved to a second level of activity – the authorised validating agency (AVA). An AVA is licensed by the central authority to approve Access Courses as providing an appropriate basis for admission to higher education and to offer certification to students. Forty AVAs had been approved by the end of 1992. They reflect a variety of collaborative relationships between higher education and further education (including higher education institutions in consortia or individually) and they describe a variety of arrangements for quality assurance. The AVA has responsibility for the scrutiny of individual Access Courses and is free to determine the detailed arrangements for their validation and review. Access Courses are approved for a fixed period and the AVA has a right to withdraw approval at any stage.

The third component of the framework is the Access Course provider. Providers who seek a kitemark for their courses have the right to approach any AVA, although most of the 593 Access Courses kitemarked by July 1992 had each been validated by a local AVA. Access Course providers are expected to be involved in the periodic review of AVAs as well as in the process of validation.

In this structure, the role of the central body was seen to be deliberately detached and its recognition of Access Courses indirect. The central body was responsible, however, for maintaining records and information on Access Courses and issuing a national register of recognised Access Courses. Responsibilities and formal procedures for dealing with appeals and complaints were to be devolved in a similar fashion and only in exceptional circumstances was the central authority expected to be involved in individual cases.

Many of the institutions and AVAs referred to in this report have changed their names during the course of the study, either because of the redesignation of polytechnics as universities following the Further and Higher Education Act of 1992, or because of mergers or new memberships. The names and titles used in the text are those which were current at the time of the research. Full references have been given to material quoted from both unpublished and published sources, the former drawn mainly from the minutes and papers of the central body and the latter taken largely from the bulletins and circulars published by the same authority. These are to be distinguished from quoted material extracted from interview and observational data which in all cases is not attributed to named individuals.

Finally, an immense debt of gratitude is owed to all those who

participated in the study and who enabled the researchers to observe their proceedings. Some groups and individuals are named in the formal acknowledgements but there were numerous others who gave considerable time, thought and support to the work of the project.

Notes

1. See also Parry and Davies (1991b; 1991c) and Davies and Parry (1992).

2. Her Majesty's Inspectorate have reported on the first three years of operation of the Scottish Wider Access Programme (Her Majesty's Inspectorate, 1993).

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Development at National Level: The Central Body

The formation and operation of the framework at the level of the central body was the primary focus of work presented in the interim report *Framing Access*. The evolution of the enterprise is reviewed here in terms of four developmental stages or phases. Some new material has been introduced – mainly to extend the period of coverage – and a chronology detailing major meetings and events has been added (Appendix II). The findings outlined in this section derive from three main sources: an analysis of documents relating to and published by the central body, interviews with members of the central body and representatives of selected AVAs, and observation of key committees and working groups.

2.1 PRELIMINARY PHASE

The need for 'a comprehensive framework' was suggested in the 1987 White Paper *Higher Education: Meeting the challenge*, where the Government set out a 'revised' policy on access to higher education and a change in the funding and national planning of the polytechnics and colleges. The policy on access envisaged a modest increase in participation rates for young people and mature entrants and identified for the first time three 'generally recognised' routes into higher education which were to support this expansion. Access courses were designated as a 'third route' alongside sixth-form qualifications and vocational qualifications (and in addition to existing arrangements for direct entry); and the validating bodies were invited to give attention to developing 'in consultation with providers' suitable arrangements to increase the availability and acceptability of Access Courses as a basis for entry to higher education.

The White Paper marked a significant shift in the policy climate for higher education, proposing growth rather than contraction during a period of demographic decline in the school leaver population and reversing a generally negative (and occasionally hostile) stance in relation to opportunities for what was termed 'non-standard' or 'alternative' entry in the first half of the decade. Indeed, Access Courses geared to a single receiving institution were the object of considerable suspicion (and derision) in some quarters in this formative period.[1] Although the White Paper declared a preference for courses which offered access to higher education more generally, it accepted the place of those linked to a specific institution

> *'provided that effective oversight is exercised by the appropriate validating authority so that the standards of access courses tailored to a specific higher education institution are suitable for entry to similar higher education courses elsewhere' (DES, 1987a: 10).*

The appropriateness of the CNAA in exercising this authority and oversight was recognised by the DES at an early stage, even though the CNAA had decided in 1986 not to involve itself in the validation or recognition of Access Courses (except in relation to initial teacher education). Informal discussions were held with Her Majesty's Inspectorate (HMI) in September 1987 and a draft letter inviting the CNAA to 'take the lead' in developing the required framework was made available to senior officers in the following month. The CNAA was considered best placed to take on this task because of its increasing interest in the provision of Access Courses (with several research and development projects supported through the CNAA Development), its comprehensive subject coverage and its current support for

> *'the kind of devolved regime for validation which would seem desirable for access courses, in view of the need to maintain rigour without imposing rigidity' (DES, 1987b).*

The same principles and credentials were prefigured in a speech by a senior officer of the CNAA at a national conference convened by the Forum for Access Studies (FAST) in November 1987 to examine the role of the various validating bodies in relation to Access Courses.[2] The conference provided an opportunity for Access Course providers to consider proposals from these bodies (an event likened to 'a beauty contest' by one observer) and for the DES to gauge opinion in anticipation of a formal approach to the CNAA.

Interests and apprehensions

The requirement to consult with providers had been signalled in the

earlier White Paper and was apparent in the DES letter of invitation to the CNAA issued shortly after the national conference. This stipulated the establishment of a working party involving 'such relevant bodies' as the CVCP, CDP, Standing Conference of Principals (SCOP), FAST and UDACE since:

> *'it seems desirable to involve a number of relevant interests to ensure that the apprehensions felt in some quarters at the the prospect of national arrangements can be overcome and that the system proposed commands the fullest possible support' (ibid).*

The nature of these apprehensions was not specified but at least four areas of concern can be recognised. The first – the question of safeguarding standards – was probably the most prominent and pervasive: partly because it was the major reference in official discourse on Access Courses at that time and partly because it was seen as the key factor conditioning the response of higher education to these programmes and their students. Given the short history of Access Courses and their uneven development by sector and subject, it was seen to be the universities more than the polytechnics and colleges which needed to be persuaded of their worth, and it was the sciences and technologies rather than the humanities and social sciences which needed to be convinced about their suitability as a preparation for degree-level study.

From their beginnings in the mid-1970s, Access Courses were identified with the (then) 'public sector' of further and higher education, especially where some local education authorities encouraged formal partnerships between their further education and higher education establishments to facilitate access and progression for the local adult population. Such arrangements were, according to the DES letter of invitation to the CNAA, 'sometimes regarded by other establishments with unnecessary suspicion' and it was important to consider therefore 'how the universities might feel able to relate to any validation arrangements which the CNAA might establish' (ibid). Less apparent in this document but central to the purposes of the White Paper was the potential of new access routes to increase demand and improve recruitment in relation to strategic and shortage subjects in higher education. Most Access Courses up to this point had developed outside of the scientific and technological disciplines, although the range of vocational and professional areas had increased significantly compared to the initial emphasis on more liberal studies and the caring professions. Moreover, access to qualifying courses in teaching and social work had been the main focus of a DES initiative

in 1978 inviting seven local education authorities to participate in pilot 'special preparatory courses' leading to higher education.[3]

A second source of concern related to the philosophy and purpose of Access Courses: their defining features, essential characteristics and collective goals. While the prospect of enhanced currency for Access Courses and their students was welcomed within the practitioner community, there was at the same time a widespread worry that any attempt to establish a national system of recognition might threaten local diversity, flexibility and discretion in the design and conduct of such programmes. More directly, there was a fear that what were commonly regarded as core principles and processes – positive action, integrated curricula, collaborative working and enhanced progression – might be displaced or diluted in the quest for wider acceptability.

Debates and disputes over the definition of Access Courses had been a feature of the pre-history of the framework and it was to be expected that these would be reproduced in early discussions. Much of this argument related to preferences for exclusive or inclusive definitions of the field: the former identified with the notion of a discrete course designed specifically for intending entrants to higher education in particular subject areas; and the latter associated with a much broader range of programmes where higher education might be one of a number of possible outcomes for individual learners.

The separate and singular attention given to Access Courses at the expense of other forms and levels of learning was a third focus of anxiety, a concern shared with the inclusive position but informed by a larger argument to do with the need for a more comprehensive framework to recognise and articulate learning of all kinds, whatever its source and setting. Finally, a more immediate and practical cause of unease was the potential for undue bureaucracy, delayed progress and unwarranted expenditure in the execution of the task. At risk then was the capacity of the framework to win the respect of receivers, the consent of providers, the attention of strategists and the support of Ministers.

Parties and players

It is not difficult to identify these separate concerns with each or most of the bodies requested by the DES to be represented at the outset. However, it would be wrong to over-identify with these general alignments since representative members were encouraged to participate in their individual capacities. Furthermore, the addition of 'other' members chosen for their expertise, experience or interest in the field offered an opportunity to engage with different perspectives and

agendas. Despite a recommendation from DES and other senior officials that the size of the working party should be contained and that requests for membership from other bodies should be declined ('to minimise its representative nature'), the size of the Steering Group was eventually fixed at 18 members and the formal representation was extended to 10 (along with the Chair), following the addition of the Business and Technician Education Council (BTEC) to the bodies stipulated in the DES letter. Other requests for membership from the Open University and the Joint Matriculation Board (JMB) were refused on the grounds of size and because it was expected that these and other interests would be recognised in the use of 'specialist advisers' (Steering Committee, June 1988).

The full membership of the Steering Committee comprised:

- ☐ a CNAA member as Chair (Professor Peter Toyne)
- ☐ a senior CVCP officer
- ☐ a senior CNAA officer
- ☐ a CVCP Vice-Chancellor
- ☐ a CDP Director
- ☐ a second CDP Director
- ☐ a SCOP Director
- ☐ a UDACE officer
- ☐ a FAST representative
- ☐ a BTEC officer
- ☐ an educational consultant (formerly at the FEU)
- ☐ an educational consultant (formerly at a polytechnic)
- ☐ a member of an open college federation involved in Access Courses
- ☐ a head of a further education college involved in the provision of Access Courses
- ☐ a member of a further education college involved in the provision of Access Courses
- ☐ a senior university academic involved in Access Courses (formerly at the CVCP)
- ☐ a university academic involved in Access Courses
- ☐ a local education authority official.

While the majority of the representative members were drawn from higher education, most of the individual members were linked to other parts of post-school education, including a local education authority and an open college federation. The omission of the Further Education Unit from the bodies specified by the DES is interesting given the location of most Access Courses in that sector. Rather, the interests of further education were to be signalled more diffusely – by

two members drawn from colleges of further education and by others with an involvement in that sector.

The Steering Committee was to report to a 'management group' – initially referred to as the Athenaeum group and latterly as the Convening Group – made up of representatives of DES, HMI, CVCP and CDP. It was anticipated that this group would convene itself at six-monthly intervals but meetings of this frequency and regularity were to prove unnecessary.

2.2 PLANNING PERIOD

The Steering Committee which was established to oversee the formation of the framework met four times between June 1988 and March 1989 and most of its work was concerned to identify the main features of Access Courses, the key principles which were to underlie their validation, and the procedures by which agencies would apply for AVA status. The Steering Committee, aided by a small Task Group drawn from its own membership, was responsible for the drafting and publication of two 'bulletins', each under the general title *Access Courses to Higher Education. A framework of national arrangements for recognition* (CVCP and CNAA, 1989a; 1989b).

As expressed in the opening remarks of the Chair, the central challenge for members of the Steering Committee was:

> *'to balance the need for quality assurance, that was perceived and widely understood, against the determination to avoid undue bureaucracy, to avoid any new barriers to extending opportunities for entry to higher education. It was generally agreed that the arrangements to be established should be low key, light in touch, devolved and demonstrably transbinary' (Steering Committee, June 1988).*

The apprehensions referenced in the DES letter and echoed in this guiding statement would seem to have been less significant in the deliberations of the Steering Committee than might have been anticipated; and it was mainly in the smaller Task Group – composed of some six members plus secretariat – that competing positions were expressed and addressed more directly.

Predictably enough, it was in relation to the definition and the role of Access Courses that differences within the Steering Group and Task Group were most marked. For those proposing a narrow definition – in support of a particular model or in the interests of standards – there was a need to preserve essential characteristics and to restrict the

range of courses able to be considered: 'it is likely that some preparatory courses will continue to operate outside the new framework of recognition; for example, courses which would be of too short a duration for national recognition but which might be suitable in relation to particular students or a particular local need' (ibid). For those preferring a broad definition – in support of flexibility and diversity – there was a need to allow for a wider role for Access Courses and to provide for the assessment of prior learning and advanced standing: 'Rather than enshrine a restrictive model or exclusive definition, it was rather for the regional/local validator to respond to the principles, and to demonstrate the quality of the link between the access course and the groups it was designed to serve' (ibid).

Although disposed to challenge the centrality of 'courses' and their 'duration' in the narrow translation, those concerned about 'over-rigid' definitions and interpretations sought instead to redirect attention to individual 'learners' and their 'experience' within the proposed parameters: the importance of 'a student centred approach'; the role of 'diagnostic assessment' as well as 'counselling and student support' ('both prior to entry and whilst on the course'); the potential of 'accreditation' – particularly that offered through open college federations – to recognise and combine a variety of forms of learning (ibid).

On the other major issue exercising the Task Group – the role of Access Courses in promoting equal opportunities and the appropriate ways to 'represent' questions of targeting and positive action – a different alignment of interests was evident; and one which turned on the construction of equal opportunities as 'educational' or 'political': 'the question of whether targeting and equal opportunities policies and practices were matters of principle affecting access course definition' (Steering Committee, October 1988). While it was acknowledged that many Access Courses had 'a clear role in implementing equal opportunities policies' and some were targeted at a specific section of the community ('for example, wider access for mature ethnic minority students'), considerable difficulty was experienced in finding a language and location for these dimensions as primary principles or as only 'supplementary' issues (ibid). In both these examples, differences were able to be aired, acknowledged and eventually accommodated within the Task Group before papers were presented to the Steering Committee for further discussion. With this co-operative pattern of working, the Steering Committee was able to move from matters of principle to decisions about procedure and organisation in a short period of time.

Strategic imperatives

Three factors in particular contributed to this style and pace of activity. Firstly, the importance and provenance of the early decisions taken by senior officials of the CNAA, CVCP, DES and HMI at a meeting at The Athenaeum in January 1988. It was at this gathering that the key components of the framework were considered and approved: the use of a 'kitemark' to demonstrate national 'recognition' of Access Courses; a 'devolved regime' for the 'validation' of these courses; the award of a 'franchise' to local validators, who might include open college federations and consortia; a locally determined certificate to indicate success in an Access Course 'recognised by CNAA and CVCP'; a 'central body' reporting to the CNAA and the CVCP and responsible for the initial 'approval' and subsequent 'monitoring and review' of local validators; a focus on 'specific courses or programmes of study', including 'modular schemes'; and the need for a set of 'fundamental principles' to be established centrally and which would embrace such features as partnership, student-centredness, links with groups in the community and arrangements for quality assurance (Convening Group, January 1988).

Both the range of matters considered and the degree of consensus achieved – especially in relation to the universities – were reported on with some satisfaction at the time: 'a very full programme of work is envisaged' and 'there is so much common ground between us all and the CVCP' (Steering Committee, June 1988). It was for the Steering Committee established by this 'management group' to prepare a statement of principles and to draw up a plan of action along these lines.

Secondly, it was made clear by the Chair (Professor Peter Toyne) at the first meeting of the Steering Committee that 'speedy progress and a tight schedule would be required' and it was for members 'to set out clearly what needed to be achieved and how to do it' (ibid). Although this resolve was related to the 'high expectations' of Access Course providers and the level of resources available to the initiative – CNAA had agreed to meet the initial costs in advance of funding from the DES – it was also presaged by the appointment of a Chair noted for his energetic and expeditious approach. One consequence of this dispatch was that initial proposals for a 'pilot phase' and 'development project' were dropped. Members of the Steering Committee had 'considerable misgivings' about the 'long timetable' as well as the nature of the exercise: it 'was not necessary as such, and could be divisive'; there were 'concerns' that the identification of 'exemplars of good practice' might be 'judgemental' and that 'not everyone would perceive this as fair. It was best to leave such tasks to others' (ibid).

Rather, the priorities for the Steering Group were to set clear targets and convey positive messages to the system:

> *'Clear outcomes were required as soon as possible ... to help in the marketing of access courses, to convince those outside who were not yet familiar with and sympathetic to access courses, and to stimulate access course development' (ibid).*

It followed therefore that opportunities for consultation were reduced or restricted. The Athenaeum group had suggested that consultation 'would need to be a priority' and proposed that a panel of consultants should be identified 'as a resource' to the Steering Committee (Convening Group, January 1988). In the event the Steering Committee used oral presentations from project workers and subject specialists to guide their work and it expected the Task Group 'to consult with interested parties'. It had also been intended to offer regional seminars and workshops to support dissemination following publication of the statement of principles as well as to produce 'illustrative guidelines' to indicate good practice: 'So far very little information has been fed back to the system on what is intended and what is required' (Steering Committee, October 1988).

Finally, the Steering Committee was supported and administered by a Secretary from the CNAA who was able to draw on the findings of project work on access-related topics funded by the CNAA Development Fund, as well as participate in forums and activities which brought together providers and receivers of Access Courses. This source of information and intelligence, together with the range of material, commentary and correspondence made available to the Steering Committee, provided an important point of reference when considering the different audiences to be encompassed by the framework. In acknowledgement of this emergent role and in order to plan a work programme 'within the constraints of the time and resources available', the Steering Committee encouraged officers and members to accept invitations from institutions and consortia to explain 'what's happening': 'It was important too for local providers to feel motivated to opt into the new arrangements for recognition' (ibid).

Although the parameters of the framework were determined in advance of the Steering Committee, it was possible to recognise different emphases and new elements introduced by this body. Alongside the stronger profile given to such matters as targeting, prior learning, guidance, monitoring and staff development, two important additions may be noted: the recommendation that the costs of validation should not fall on students and the expectation that the Access Courses embraced by the framework would involve a minimum

number of study hours. While the case for the former was made in the associated papers the rationale for the latter was not. Only in the notes of the meeting at The Athenaeum is there a clue to the origin of this calculus where the 'definitions' adopted in a contemporaneous CNAA-funded database project on access studies were considered 'an appropriate reference point' (Convening Group, January 1988). Some of the preliminary findings from this development project were presented by a member of the project team at the second meeting of the Steering Committee.

Communications and adjustments

The principal means by which the Steering Committee communicated these protocols and procedures was through the two bulletins published in the name of the CNAA and the CVCP. In the absence of other public forms of dissemination and given an early decision by the Steering Committee not to engage in a formal consultation exercise, the publication of these documents has been of major significance in shaping understandings and perceptions of the framework exercise:

- they represented the single means by which the central body communicated publicly with prospective AVAs and Access Course providers
- they announced that only written applications for AVA status would be considered and that intending AVAs were to inform the central body of their 'interest' before submitting a formal application (CVCP and CNAA, 1989b: para 8)
- they indicated that formal visits to progress applications would be undertaken 'infrequently' (ibid: para 16) and that submissions would need to be 'brief and concise' (ibid: para 17)
- they identified 'certain key principles' of Access Courses and their validation which were defined at the outset and which avoided reference to the competing definitions which characterised the field (ibid: Annex Ab)
- they anticipated key dissemination events at a regional level 'to provide more details of the scheme, and to receive the views of Access Course providers and potential validating agencies' (ibid: para 33).

The intention that arrangements relating to the framework would be 'light in touch' and 'low key' was stressed in both documents but there were two instances where a change of emphasis may be discerned. The first and most conspicuous was in relation to the type of agency able to apply for a franchise. In the first bulletin, such an agency might be a CNAA institution, a university, or 'a consortium

which included such institutions' (CVCP and CNAA, 1989a: para 23a). There was some uncertainty about the status of 'consortium' at this early stage; and it was suggested that documentation from consortia should be 'fuller' and that such a grouping must 'include' rather than just 'involve' one or more institutions of higher education (Steering Committee, November 1988).

However, in the second bulletin, these alternative types of agency were presented in reverse order and the notion of a consortium was expanded while that of an individual institution was contracted:

> *'A validating agency may be either: a consortium (an open college network or an access federation) which includes a higher education institution, or an individual higher education institution' (CVCP and CNAA, 1989b: para 9).*

In addition, intending AVAs were expected to adopt 'a collaborative approach' – the subject of a separate section in the second bulletin – which involved the providers of Access Courses in the process of validation and review and which did not threaten existing collaborative relationships between higher education and further education institutions. More specifically, consortia arrangements were considered to have 'Considerable merits', which included:

> *'facilitating transbinary arrangements between universities, polytechnics and colleges as well as between FE and HE; a collaborative mode of working, which involves the Access Course providers; fewer agencies seeking approval within the scheme, and therefore advantages on grounds of economy; averting the prospect of undue competition between validating agencies seeking to take responsibility for individual Access Courses' (ibid: para 20).*

Once more it was the active voice which was reserved for discussion of consortia arrangements and it was the passive voice which was preferred for individual higher education institutions who were invited to apply 'as well' and who might be approved 'so long as' they demonstrated how collaboration was built into their process of validation and review.

The second shift in emphasis was less apparent and concerned the priority accorded in the second bulletin to applications from those experienced already in the validation of Access Courses. Such a stipulation did not feature explicitly in the first publication where higher education institutions and consortia 'that are validating Access Courses, *and those intending to do so* [our emphasis], will be invited to apply for a franchise' (CVCP and CNAA, 1989a: para 8). Although there was reference in the same document to the need for the submission to set

out 'the validator's current role and experience with Access Courses to date' (ibid: para 23c) the importance to be attached to previous and current experience was not conveyed until the second bulletin where the central body now reserved the right 'to put those with experience to the front of the queue' (CVCP and CNAA, 1989b: para 24).

It was in the fourth and final meeting of the Steering Group in March 1989 that these two new criteria for considering initial applications were agreed. Support for consortia schemes in preference to single institution models was to be encouraged 'wherever possible' and reflected the 'overriding importance to be attached to applicants' demonstration of collaborative arrangements whereby Access Course providers (usually FE institutions) participate in the process of validation and review'. Furthermore, 'It was intended to deter an institution that was part of a consortium from applying on an individual basis, in competition with its consortium' (Steering Committee, March 1989). This, in turn, would require agencies to demonstrate extant working relations with the course provider(s) and it would be on the basis of such collaboration that franchises would be granted in the first round. While this would seem to debar consortia or institutions who had yet to forge such relationships, the reference to 'experience' in this same discussion was couched in terms of 'preference' so as 'not to exclude those establishing Access Course validation for the first time' (ibid).

A large number of proposals had been expected in the first round and the requirement that applicants give prior indication of their intentions to the central body was suggested as a means of anticipating demand and allowing, where necessary, for 'local discussions' to be arranged 'to avert the prospect of unnecessary duplication and expense' (ibid).

Prior to the publication of the 'statement of principles' in February 1989 and the 'invitation to apply' in April 1989, a second meeting of the management group (now styled 'Convening Group') had been requested by the Steering Committee to discuss the future funding and form of the central body offering the franchise to AVAs. In advance of that meeting, the Chair of the Steering Committee had already made known his view that 'creating a large validating body was not the intention' (Steering Committee, November 1988).

The Convening Group concurred with this view – time and resources were key constraints – and 'a special Committee for recognition of Access Courses' was proposed with a 'small' number of members chosen 'to reflect the principal constituencies of interest'. Such a body would assume the role played previously by the management group and the Steering Committee would continue as a 'refer-

ence group' to support and monitor the scheme 'with the right to submit reports to the new Committee' (Convening Group, February 1989). It was left to the Steering Committee to consider further the nature of this proposed change and, at what proved to be their last meeting, they anticipated a 'complementary role' as 'adviser' and 'watchdog' to the central body. More particularly, it was evisaged that the newly constituted Steering Committee would contribute also to the dissemination, exploration and evaluation of the scheme: 'acting as a focal point for receipt and dissemination of developments within the field', organising dissemination events on a regional basis, and attending validation events conducted by applicant AVAs (Steering Committee, March 1989).

Unlike the first meeting of the Convening Group which was concerned with principles as well as procedures, the second gathering of these officials and members was concerned with more practical questions: the timetable for implementation; the cohort of Access Course students to be embraced; the workload of the central body; monitoring and evaluation of the early operations; the possibility of making adaptations or fine-tuning 'in the light of experience'; and the costs of recognition. In the case of resources, the DES representatives accepted the view of the Steering Committee that the costs of kite-marking should not be placed on individual students: 'The provision of resources for validation, however, was a matter for local determination' (Convening Group, February 1989).

2.3 OPERATIONAL STAGE

The proposal to establish a central body with overall responsibility for the national framework was accepted by the Secretary of State in April 1989 and the Access Courses Recognition Group was founded with a remit to consider initial applications for a franchise, undertake subsequent reviews, act as an adviser or adjudicator, and maintain records and information on Access Courses, including a national register of those 'recognised' within the framework. Unlike the Steering Committee for the scheme in which the CNAA was the lead body and 'handling agency', the ACRG was to be 'jointly owned' by the CNAA and the CVCP. It is interesting to note that at the meeting of the Convening Group where this was proposed it was presumed that the CNAA would be invited to act as the designated central body operating 'on behalf of the polytechnics, colleges and and universities' and working 'in partnership with the CVCP and BTEC' (Convening Group, February 1989).

Although the letter of invitation from the Secretary of State referred to a group of no more than eight to 10 members appointed by the CVCP and the CNAA 'in an individual and not a representative capacity' (DES 1989), the membership of the ACRG was eventually fixed at 13 and drawn as follows:

- a CNAA member as Chair (Professor Peter Toyne)
- a CVCP member as Co-Chair (Professor Berrick Saul)
- a CDP Director
- a CVCP Vice-Chancellor
- a senior polytechnic academic involved in Access Courses
- a senior university academic involved in Access Courses
- a head of a higher education college
- a head of a further education college involved in the provision of Access Courses
- a member of a further education college involved in the provision of Access Courses
- a local education authority official with particular knowledge of open college consortia providing Access Courses
- a senior local education authority official
- a senior CNAA officer
- a senior CVCP officer.

The senior local education authority offical was added to the membership of this body following the first meeting of the ACRG. As in the case of the Steering Committee, representatives of the DES and HMI attended as assessors along with the two Joint Secretaries and a number of observers. The ACRG was to be assisted by a wider 'Consultative Committee' consisting of former members of the Steering Committee not translated to the ACRG and others to be drawn from 'specialists' amongst Access Course providers, open college practitioners, local education authority officials and higher education staff.

Following completion of the 'development phase' funded by the CNAA, the DES awarded a pump-priming grant of £72,000 to the CVCP and the CNAA to fund the 'operational phase' of the programme during the academic year 1989–90. Although the grant was paid in equal shares to both bodies, the full amount was passed on to the CNAA in view of their responsibility for the bulk of the servicing of the central body within the CNAA offices. Funding therafter was agreed by the Polytechnics and Colleges Funding Council and the Universities Funding Council at the same level but with an amount retained by the CVCP to cover part of the salary of their Joint Secretary to the ACRG. The balance was passed on to the CNAA.

The adjustment was in recognition of the increasing involvement of the CVCP Joint Secretary in advising intending and applicant AVAs. Indeed, the role of the joint secretariat has been crucial to the development and progress of the framework, not just in terms of the preparation of papers for and following on from meetings – mainly the responsibility of the lead CNAA Joint Secretary – but also in guiding agencies who were preparing or revising submissions and in disseminating information across their respective networks. In the light of this experience, the CNAA and the CVCP formulated bids for 1991–92 to the funding councils based on an increase in the level of staffing for that year, but these extra resources were not agreed.

2.3.1 Scrutiny of applications

Sixty-one agencies had indicated their intention to apply for AVA status under the scheme by the time of the first meeting of the ACRG in June 1989. In order to reassure applicants (and Access Course providers) that 'they would not be disadvantaged if they were not included in the first batch to be processed' (Steering Committee, June 1989), it was agreed that all submissions received before the end of 1989 would be considered progressively over the year 1989–90, with arrangements made where appropriate on retrospective cover for the 1989–90 cohort of students.

The original intention had been that scrutiny of submissions would be undertaken 'normally by *ad hoc* working parties' and 'mainly through correspondence' (ibid). This procedure was to be varied for the first batch of 12 submissions but other applications were expected to be considered without the need for working parties to meet between themselves or meet with representatives of applicant agencies. Indeed, it was envisaged that comments and recommendations from members would be collated by the secretariat and then presented to the ACRG for decision.

In the event 16 submissions were considered in the first round. These were selected by the Joint Secretaries in consultation with the Chair and Co-Chair so as to embrace 'a wide geographical spread' as well as 'the many different' models and 'the different stages of development' of agencies. The submissions were circulated to and scrutinised by all members of the ACRG and the Consultative Committee in order to identify 'standards' and to establish 'common ground' and 'case law' (ACRG and Consultative Committee, September 1989). Members were divided into working groups chaired by a member of the ACRG but drawing on both groups for membership. Each group made a report and recommendation to the ACRG on the submissions

they had examined and the ACRG formally agreed a decision in respect of each application.

After some preliminary discussion at a joint meeting of the ACRG and the Consultative Committee in September 1989, four possible recommendations for working groups were identified:

- ☐ 'approval, subject to conditions'
- ☐ 'deferral pending consideration of further details to be requested': it was expected that approval would be recommended and applicants were encouraged to respond to the matters raised as soon as possible to allow for circulation to all members of the original working party, for clearance of comments through the Chair, and for a recommendation to be brought to the next meeting of the ACRG
- ☐ 'reference back, with recommendations and an invitation to resubmit': it was expected that a revised submission would be brought to a new working party in due course;
- ☐ 'reference back, with a member level meeting, to be held with the agency's representatives' (ibid).

Half of the 16 applications in the first round were deferred pending a request for additional information. Only three submissions were recommended for approval as presented, while four were invited to re-submit and one was referred back for a meeting with officers and members.

Rather than move away from the use of meetings, the pattern in subsequent rounds was for working parties to meet in order to consider an application and, more significantly, for them to meet with representatives of applicant agencies where clarification or revision was thought to be necessary. Such an opportunity for dialogue had also been requested by some applicant agencies who wished to address the working party as well as respond to questions posed by that group. Likewise, the advice the Joint Secretaries made available to agencies in advance of an application was sought more openly and obtained more directly in later rounds, frequently by means of 'exploratory meetings'. This was in contrast to the minimal and mostly informal guidance evident in the preparation of the early submissions.

The need for the central body to continue (and to extend) the initial format reflected a number of considerations: the quest for consistency and fairness in the treatment of applications; the prospect of lengthy and complicated correspondence where there were several, often interrelated, issues which needed attention; the acknowledged failure of an experiment involving scrutiny of one submission solely by correspondence; the anticipated difficulties presented by some later

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applications where agencies were more recent in origin, were less familiar to members and were in the domain or purlieu of AVAs which had already been approved; and finally the tendency in a number of applications for the criteria set out in the bulletins to be restated rather than illustrated, interpreted or developed.

The depth and directness of the scrutiny occasioned by more regular use of meetings with representatives of applicant AVAs was accompanied, according to some members and observers, by more stringent application of criteria and principles than in some earlier approvals. For those responsible for the framework, such adjustments and adaptations were to be expected given the 'evolutionary mode' adopted by the ACRG: they were 'still within "the learning curve" experienced by any new body just formed' (ACRG, January 1990).

The question of representation and collaboration within an AVA and competition between AVAs figured large in the majority of those applications which were the subject of referral and resubmission. Indeed, it was not uncommon for these applications to be brought back in a different form, either by the addition of other higher education partners or as part of a consortium or joint application rather than a single institution submission. While these new formations developed out of discussions with officers and exchanges with working parties, such activities were not to be construed as 'planning':

> *'The ACRG is not a planning body, and no validating agency will be rejected, or disadvantaged, on the grounds that another agency in the same geographical area has been approved. A sensible pattern of provision will be encouraged, however, and appropriate inter-institutional collaboration is being promoted. No single AVA will be given a monopoly in any geographical area' (CVCP and CNAA, 1990a: para 24).*

Similarly:

> *'Some institutions appear as party to more than one applicant validating agency. There is no objection to this in principle, but the formal relationships of the institution with any consortium must be clear. The validating agency must act with authority from the higher education institutions in membership' (ibid: para 25).*

The issue of collaboration and competition was sometimes the single source of concern for a working party but more often this dimension was addressed in combination with such matters as extent of experience, scale of activity, range of competence, spheres of influence, and specific arrangements for quality assurance.

Some 38 AVAs had been approved by August 1991. This extended

coverage to most areas of England, Wales and Northern Ireland, and embraced nearly all the major establishments of higher education in these parts of the United Kingdom. Using the classification adopted by the ACRG (ibid: para 36), six of these were 'open college' federations or networks accrediting learning at four levels from basic education through to pre-degree studies; 23 were 'consortia' (or 'joint committees' of institutions) embracing colleges of further education and at least one institution of higher education; and nine 'single institution' agencies where one institution of higher education (or two such institutions acting jointly) had arrangements to involve Access Course providers at a number of levels in a collaborative scheme.

No detailed breakdown of the resources available to AVAs was required as a condition of approval but confirmation was sought 'that the arrangements described are feasible': 'The agency must indicate that it has resources available to it to implement the scheme for validation as set down in the proposal' (ibid: para 22). At the time of the first round of approvals, resources for open college networks came mainly from local education authorities, although subscriptions from members and fees from users were beginning to be considered in some federations. Consortia AVAs were generally less dependent on local education authority support, except in a small number of cases where such bodies took a key role in co-ordination and operations as well as with resources. Single institution AVAs were more reliant on resources – cash and kind – from the institution of higher education acting as the validating agency together with fees from course providers (usually in further education) and occasionally from students, even though it had been 'strongly recommended' by the central body that 'the burden of such costs should not be borne by individual students' (CVCP and CNAA, 1989b: para 7).

Only one applicant agency has been rejected to date: a 'speculative' resubmission from a single institution agency which was considered 'unique' and where the establishment was already in membership of an AVA approved in the first round. However, the decision 'not to approve' this agency was not necessarily final: the single institution was offered an opportunity to meet with members of the ACRG and was 'free to resubmit in due course, should it wish to do so' (ACRG, April 1990). It had not done so to date. The length of time and amount of attention devoted to this application – a matter of eight months between consideration by the working party in the first round and rejection by the ACRG in April 1990 – was in some contrast to the extended treatment received by another agency which was referred back with a member level meeting in the first round but which

was eventually approved after nearly two years of correspondence, discussion and revision.

AVAs were approved on the basis of standard conditions, further conditions and recommendations and comments. Approval was given for an unspecified period, subject to review at a time to be fixed by the ACRG following negotiation. One of the standard conditions of approval required an explicit commitment from the AVA to 'conform with and abide by' (CVCP and CNAA, 1990a: para 50) the principles and guidance set out in the documents published by the central body. In this way, the published bulletins were invested with a prospective as well as retrospective importance in 'determining and directing AVAs on the one hand and advising and suggesting matters for improvement on the other' (ibid: para 52). The status of these bulletins has been somewhat ambiguous: a source of 'advice rather than regulations', designed to 'help AVAs and Access providers in their own development processes, ongoing monitoring and evaluation', and '*not* intended to be prescriptive'; yet they identified the 'requirements' which AVAs must adhere to at the time of the approval and which the central body might add to or amend in the future 'based on the continuing experience of the ACRG' (CVCP and CNAA, 1990b: para 10).

The assumption in the published documents, supported by evidence of a survey conducted in 1989,[4] was that very few current courses were 'free-standing, and in search of an AVA' and that most students would progress 'to the higher education institution(s) or specific degree course(s) already linked with the Access Course, as they do at present' (CVCP and CNAA, 1990a: para 14).

It followed therefore that AVAs were expected to be local or regional agencies. On the other hand, providers of Access Courses were free to seek validation beyond that region or locality. Indeed, at the first meeting of the Convening Group for the framework, it had been suggested that the central body should have a residual validating role to allow for the possibility of 'some individual access courses coming direct to the central body for recognition' (Convening Group, January 1988). This option was not pursued even though some AVAs had been approved only to validate Access Courses in certain subject fields (such as humanities, social sciences and teacher education), in defined territories (such as outside of a local education authority served by another AVA) and in respect of particular styles of course or forms of recognition (such as open college accreditation and validation). In practice, nearly all kitemarked courses had been validated by a local AVA; and only one AVA had an extra-regional remit.

2.3.2 *Perceptions of participants*

Those who participated in the implementation of the framework at national level – as members of the ACRG and the Consultative Committee or as representatives of prospective AVAs – held different views about the nature and conduct of the exercise. In general, perceptions about the structures, procedures and processes adopted by the central body were underpinned and justified in terms of their understandings about the functions and purposes of the framework. Among members of the central body three perspectives or emphases were apparent:[5]

- a student-oriented view which saw the object of the exercise as creating greater credibility for Access Courses as a genuine 'third route' and thereby promoting wider choice and enhanced participation for students: 'to legitimate and empower access work rather than to standardise and control'; 'it's part of a general movement to flexibility and transferability across the whole system'
- a standards-oriented perspective which was concerned with providing a clear framework within which the maintenance of standards might be assured in order to generate greater confidence across the whole of higher education: 'it's very important to expand HE but we couldn't allow a free for all'; 'we have to give HE institutions, the universities in particular, confidence'
- a managerial, task-oriented approach which accorded priority to developing an area of policy within a given timescale and considerable resource constraints: 'it was quite clear what we were doing – we had to get something up and running quickly'; 'the task of the ACRG is to authorise AVAs, to produce consistency, criteria and credentials'.

These intersecting and overlapping sets of interests were usually held in combination – with the task-oriented approach normally combined with one of the other two. However, for most individuals in most situations it was possible to recognise one cluster of interests and meanings as dominant. In the remainder of this outline of the operational stage of the framework, these different perspectives are referenced in relation to a number of key themes and concerns which have characterised this phase; and which have continued to engage participants, practitioners and commentators through to the present.

2.3.3 *People and procedures*

Common to each of these three approaches was the view that membership of the ACRG must include individuals who carried some

weight at national level and who spoke for the main interest groups: 'credibility matters – we must be seen as credible by the system'. For those identified with a student-oriented or standards-oriented perspective it was important to have people who had influence on the higher education system as a whole, individuals who were able to take a broad view: 'it needs VCs and Directors to get beyond the band of enthusiasts and make it respectable'. Practical knowledge and direct experience were seen as less important than academic authority and strategic understanding: 'we are concerned with overall policy, not the nitty gritty'. For those with more task oriented priorities, detailed knowledge of practice was not simply unnecessary but might actually impede efficient decision-making.

Most members of the ACRG (senior managers largely representing higher education) believed that its membership was about right: 'FE are there with strong voices but it's right that most are HE people – all the work is about HE because Access is a means to an end and the end is HE. All the consequences are borne by HE'. Only a minority of members alongside a number of those on the Consultative Committee were concerned about the consequences of this weighting: 'It's not about representation but about the perspectives which can inform the work – people who want to be practical and grounded rather than lofty and academic'; 'some of the muddles' which attended the ACRG 'would not have happened' if there had been greater familiarity with the field.

The need for direct knowledge and experience of provision was more readily acknowledged by the ACRG in the detailed scrutiny of applications. A 'wider committee and advisory panel' was established at the first meeting of the ACRG to 'assist' in this task. A membership of 'some 30 people' was proposed, consisting of members of the ACRG itself, members of the former Steering Committee, and others selected in consultation with the Chair and Co-Chair. These 'additional advisers' included individuals and nominating bodies suggested initially by the Joint Secretary from the CNAA as well as those identified subsequently by the ACRG to reflect the interests of further education, local education authorities and employers in general and 'the universities in particular' (ACRG, Juñe 1989).

Although described formally as 'a wider Consultative Committee' this grouping has functioned mainly as a panel of specialist advisers from which individual members were selected to take part in *ad hoc* working parties to scrutinise submissions from applicant agencies. Furthermore, the membership of this panel has been separate from that of the ACRG and it has not met as a group outside of the four joint meetings of the ACRG and the Consultative Committee to

consider applications and review progress. By August 1990 membership had grown to 24 people, with roughly half drawn from establishments of higher education and the remainder drawn mainly from open college networks, colleges of further education, local education authorities, validating bodies and independent consultancies. Members were appointed initially for a term of office up to December 1991.

The perceived imbalance in membership between providers of Access Courses and those in higher education had been brought to the attention of the ACRG over a long period and from a number of sources, most notably from members of the Consultative Committee. One member of the Consultative Committee did express a contrary view however, pointing out that although many individuals were drawn from polytechnics and universities 'they are often continuing education and therefore represent providers and not receivers'. For its part, the ACRG declared that it was 'determined to address this issue and to seek out additional members who are practitioners directly involved with Access Courses' (CVCP and CNAA, 1990b: para 71).

Concerns about the composition of the central body were reflected in different perceptions about the process of scrutiny and approval. The arrangements adopted assumed that the central body would reach decisions on the basis of detailed consideration of written proposals and that supplementary meetings would only be necessary where there was 'reference back' to the applicant agency. The preference for a paper-based exercise was in part conditioned by limited resources, but more significant perhaps was the need to avoid 'old style CNAA visitations': a feature of the binary past which neither the universities nor the polytechnics wished to recover.

Although the original invitation to apply for a franchise requested that submissions be 'brief and concise', the information to be provided included an outline of the structure and composition of the validating agency and statements setting out 'the operational processes and procedures for course approval and for ongoing monitoring and periodic review', 'the principles and criteria adopted by the validating agency when considering individual Access Courses' and the 'experience of the validating agency' in approving Access Courses or schemes to date (CVCP and CNAA, 1989b: para 18). In the case of the latter, these courses had to be listed by title, name and address of the providing institution, contact name at the providing institution and date of first approval by the validating agency, and a statement provided about how their mode and duration related to the published guidance regarding a minimum number of study hours. In addition, applicants were invited to 'use existing documents if they wish' (ibid: para 17).

The result was a volume of paperwork, especially at the beginning, which was 'overwhelming' and which often made it difficult to follow through themes and ideas. Because the format was relatively open 'each was different so that we weren't comparing like with like' and 'crucial bits of information were hidden in the appendices'. Several members suggested that clearer guidelines would have avoided some of the 'unnecessary bad feeling' and 'resentment in the field' which accompanied the early stages. In the light of this experience, the ACRG offered 'further clarification' concerning the format and contents of later submissions, recommending that applications follow 'a standard pattern' and limiting the main documentation to no more than 10 sides of paper (CVCP and CNAA, 1990a: para 22). As a consequence of this guidance some members noted that later submissions often seemed thin by comparison and the need to meet with representatives of applicant AVAs was often essential to gauge the quality and authority of a submission.

The limitations of a paper-based system were widely acknowledged: 'after reading a pile of these, I sometimes think, what is the connection with the real world?'; 'I worry about how much the documents reflect a reality'; 'it's not always clear what is actually happening and what is just a plan'; 'we have not yet found a strategy for examining what's behind the paper'. Nevertheless, there was general agreement that a meeting with each applicant agency would have been neither possible ('for practical reasons – we are only able to give a certain amount of time') nor desirable ('meetings would inevitably have been seen as inquisitorial' and 'it should be about inclusion rather than exclusion').

The increase in the use of meetings and their employment at an earlier stage in the progress of a submission represented 'a significant change – it is a much more developmental approach and has budget implications'. There were mixed views about this shift. Some believed meetings were valuable and more of them could have avoided some misunderstandings: 'it was right to be paper-based at the beginning; it is right to be moving away now'; 'there should have been meetings earlier – correspondence has not always been friendly or expressing enough concern. If that meant CNAA-style visits, so what'. Others regretted this trend: 'it's very expensive PR'. Two members of the Consultative Committee were concerned about the status of these meetings: 'there seemed to be some confusion about whether we were there to accept or to advise on revisions to their submission'; 'there was some uncertainty about the structure of command in some meetings – the working group seemed to be making decisions and telling the agency what they were' when normally that was for the ACRG to

do. Another member of the Consultative Committee had not been convinced that the right people from the AVA were attending: 'ACRG should have specified who should attend – we should see the people who are doing the validating'. Yet in spite of such reservations there was general agreement that those meetings which had taken place had been effective and useful.

Although they had received written guidance and a briefing about criteria and possible outcomes, the process of scrutiny in working groups was unclear to many members at first. Some on the other hand knew exactly what they were looking for. Groups were made up of people from different backgrounds and experience 'who quite rightly come on their own terms with their own agendas and priorities'. It was not until the second round of approvals that a general understanding seemed to have emerged. Even so, members who joined after the first round felt 'excluded' since it was still 'not clear what was going on'.

Groups were different in their dynamics and in the style and approach of the Chair: 'the time given to some submissions was on at least one occasion very uneven' and 'questions were asked of some and not others'. Because the ACRG was not in a position to conduct a close comparison of process and outcomes there was inevitably a dependence on the secretariat in consultation with the chair to ensure consistency. This may on occasion have allowed the briefing notes prepared in advance by the secretariat and attached to each submission to influence working groups unduly, but more common was the view that working parties were generally well-chaired, that discussion was open and wide-ranging, and that members displayed a genuine desire to reach consensus: 'there are some vested interests but mostly professionals who are prepared to give way and a consensus reached'. Examples were sometimes quoted where submissions went through on the basis of 'it's OK because we know so and so' or where 'gossip' – in this case information received at third-hand – was repeated in a working group and was thought to have adversely affected a decision. These were considered isolated cases and amongst the ACRG there was broad agreement that the use of working parties in this way represented an effective and proven mechanism, even if 'it will never be one hundred per cent'.

Most members of the ACRG acknowledged that at least some of the criteria had been 'developed' as the scheme had progressed. Few were troubled by this – it was an inevitable 'part of the learning curve' – and most were unaware of 'any policy which has not been modified, that was wholly predictable and necessary'. Some interpreted this in terms of later applicants 'getting a better ride because they are getting

less irritations' from the central body. Others thought they were now more demanding but that this had been balanced by the greater advice offered to recent applicants. Others saw it rather as a function of increased diversity: 'we're getting different models using different language' and whereas 'the first batch were pretty robust and well-established – we were just helping to mould a bit – now we have got more experience and the AVAs are newer'. More significant again was the view that 'consistency is not primarily relevant – it's about thresholds; the main point is, is it satisfactory?'. Questions of consistency had to confront problems of diversity: 'how to get consistency and let a thousand flowers bloom'. No one was sure they had got it right ('there will be mistakes, there always are') but at the same time 'there have been no huge injustices'.

Members of the Consultative Committee had a greater sense of unease about whether consistency and hence fairness had been achieved. In part this may have been due to Consultative Committee members being closer to developments and sentiments in the field – 'with insider knowledge, I would not have approved it' – and in part because they often 'lost track of the submissions' following scrutiny by a working group. Direct knowledge of the working of particular AVAs on the ground led some to worry about quality and viability as well as consistency: 'the submission was not altogether the truth – it was inaccurate and over-optimistic'; some AVAs were 'in a shambles'; and 'I'm worried that they are admitting anyone who applies in reality'. On the other hand, all members were 'impressed that everyone is trying very hard to be fair'.

Unease was also expressed by members of AVAs, who often discovered that when they compared experiences an issue which was a source of problems for one working party (for example, certification and grading) was not for another, despite similar practices in each submission. Similarly, there was some anger where an AVA had 'spent a long time on our submission and a lot of people worked very hard' only to see that 'being undermined – it's a kind of insult – when weak submissions where we know what is really happening have gone through'. As 'outsiders' to the practices and procedures of the central body, especially if there was no member serving on the ACRG or the Consultative Committee, representatives of AVAs were particularly sensitive to apparent inconsistencies, anomalies and inequalities in the treatment of different agencies.

For AVAs, direct contact with the ACRG was limited, infrequent and usually by telephone or correspondence rather than face to face. The first three bulletins published by the central body were their main source of information during this phase: the first and second setting

out the principles and procedures governing the exercise and the third (published in February 1990) reporting on progress and offering further guidance concerning submissions to be made to the ACRG. Some agencies reported that local distribution was uncertain and variable, and a number criticised the bulletins for their uneven terminology and indeterminate status. The attempt to communicate authority and clarity on the one hand and retain necessary ambiguity on the other had caused some confusion at local level and was regarded as threatening by a few. This was less a concern, however, in areas of limited development or uncertain support for Access Courses, where the bulletins were welcomed as 'moves in the right direction' and a useful means 'to get movement locally'.

The language and tone of correspondence, particularly in the reports of working parties which were sometimes attached as annexes to letters, had on occasion caused offence. Such phrases as 'they must not be allowed to get away with this' or 'this is not in the spirit of Access' had touched a number of raw nerves. Some AVAs were also unclear about the status of the 'further conditions' and 'recommendations' in their letters of approval, and how and when they were expected to act on them, if at all: 'it's never clear in letters whether it's an instruction, a request or a query'. Similarly, many were unsure how they should respond when bulletins appeared to be giving advice or making recommendations which did not accord with their present practice, even though that practice was in place at the time of approval and/or included in their submission.

As in the case of the Consultative Committee, a recurring theme in discussions with representatives of agencies along with practitioners, was that some of the perplexity and uncertainty experienced by AVAs, and some of the difficulties encountered by the ACRG (especially in relation to the role of external moderators and external examiners), could have been avoided if the interests of further education had been more strongly represented in the central body. In the main this came from a belief that informed decisions about appropriate criteria and appropriate ways of operating them should draw on those with expertise and experience in Access provision. The context for this provision was collaboration and partnership between further education and higher education: an arrangement which was claimed to benefit all those involved and to improve the management and delivery of provision. Indeed, this was what 'they [the ACRG] are preaching at us but are not prepared to do themselves'. As might be expected, within many AVAs it was the further education rather than the higher education partners who were most concerned 'about what the ACRG is up to'. Yet this was not always the case since some higher

education institutions were determined to assert their own competence and independence in these matters: 'We know what validation is about and what standards are necessary and don't need them [the ACRG] to tell us'.

In general, judgements about fitness, consistency and fairness in the development of the framework depended on whether the frame of reference was a macro one – the system as a whole (the ACRG) – or a micro one – the specifics of particular cases (more common amongst the Consultative Committee and the AVAs). This potential for confusion and suspicion, part structural and part cultural, was recognised by each of the parties but was not expected to block development or delay progress during the operational stage. Most attention was focused otherwise on four major themes and issues: the definition of courses and programmes; the place of equal opportunities and targeting; the application of quality assurance and standards; and the dynamic of collaboration and competition. These questions were to be a source of continuing concern through to the present. The perceptions recorded during the operational phase relate to the period up to August 1990 but reference is also made to the contents of a fourth bulletin published later in the same year.

2.3.4 Courses and programmes

Course definition

According to the early bulletins, 'Access Courses' were to be understood as a composite category and they embraced the notion of a course ('a convenient shorthand term'), a 'programme of studies' (which 'may be identical' with a 'course') and an 'organised educational experience' (which was neither defined nor discussed) (CVCP and CNAA, 1989a: Glossary).

The 'objectives and main features' which identified and distinguished these courses made rather more reference to the type of student to be recruited than to the nature of the curriculum offered:

- ☐ 'facilitating entry to higher education
- ☐ providing mainly for mature students, being designed and taught to meet their needs
- ☐ catering for those without conventional entry qualifications who do not yet feel ready for direct entry to higher education
- ☐ meeting the needs of specific groups in the community, identified as under-represented in higher education, and thereby facilitating implementation of equal opportunities policies
- ☐ providing a planned programme of studies, or an organised

educational experience which is an alternative to the courses provided by other educational, vocational or professional examining authorities' (ibid: para 16).

The aim of facilitating entry was generally equated with access to first degree courses and the 'alternative' nature of such courses was meant to distinguish them from GCE A-levels and other national qualifications where entry to higher education might not be the primary goal and where curricula were not oriented to specific groups. More significant for this definition but separate from this statement was the claim that Access Courses so defined 'normally involve a minimum of 500 study hours, including private study, project work and contact hours' (ibid: para 17). Such courses covered only 'part of the spectrum of activities' which assisted students without conventional qualifications to enter higher education and their focus was meant to be 'more restricted': 'It would not help these courses gain wider currency if too wide a range of activities were recognised as Access Courses' (ibid: para 15).

Only those Access Courses which adhered to 'certain key principles' were intended to be recognised under the scheme. However, neither the central body nor the AVAs were expected to follow these specifications 'slavishly', but instead were to use their 'discretion' as to the extent to which a particular course satisfied the 'spirit' of these requirements. Such a course would have:

- ☐ 'clearly stated objectives' and would indicate those higher education opportunities for which it was intended to prepare students
- ☐ 'effective course management arrangements'
- ☐ 'appropriate partnerships' between institutions preparing students for higher education and those in higher education to which the students aimed to progress'
- ☐ 'a student-centred approach', embracing counselling, diagnostic student selection, curriculum and teaching strategies, on-course guidance, learning support services, and modes of assessment
- ☐ 'effective links' between the Access Course and the group(s) in the community which it was designed to serve
- ☐ 'sound arrangements for quality assurance, including peer review and attention to the role of external moderators'
- ☐ 'appropriate student records and arrangements for monitoring and evaluating the progress and performance of Access Course students on the course and where possible afterwards' (ibid: para 25).

A range of other issues and criteria were listed which were 'sup-

plementary' to these 'matters of principle' and included such questions as 'the relevance of the curriculum to the needs of the local target group', the 'effectiveness of the programme of studies in promoting equality of opportunity' and 'the appointment of external moderators' (ibid: para 26).

Across the bulletins there was a movement away from a language of 'courses' to that of 'programmes of study' and in later documents strong guidance was given to AVAs about the need to 'state clearly' how the Access Course was organised as a 'planned' programme of study to ensure the integrity of provision for individual students (CVCP and CNAA, 1990a: para 49).

Modularisation and accreditation were the key determinants and dimensions in this movement to more open and flexible forms of Access provision, especially where programmes had been developed by open college federations or networks. Among members of the central body there were some significant differences of approach to these issues. 'Most people started with the idea of an access course but they learned that pre-designed courses are not always appropriate' and this 'really came about by looking at some of the open college submissions'. Although it was accepted that both course-type and programme-based models of provision were acceptable within the framework, those holding the standards-oriented view tended to prefer the idea of a course and 'are still worried about the management of a programme of that sort [pick and mix schemes] for the student'. Interestingly, those taking the student-oriented view were not themselves in agreement. Some preferred a 'course': 'the group is important to Access, the developmental, integrated nature of the course is crucial. Without it, disadvantaged students cannot be brought into the system'. Others sensed 'a danger of fossilising a course as a particular and only way of delivering it' and argued that 'the coherence comes from the individual not the content of the course – group identity and support can be ensured without the students being together all the time'. There was some concern that the 'problem of the credit accumulation course is not fully resolved' and that 'we haven't cracked this one at all' but it was important to do so because 'access courses are on their way out and ACRG must address this issue'.

The fourth bulletin, published in November 1990, placed these questions more directly on the agenda of AVAs by listing the advantages of modular schemes ('short-term learning goals, flexibility, and more rapid updating of learning material') but also by warning of the 'inherent dangers of fragmentation and incoherence' (CNAA and CVCP 1990b, para 59). Guidance was offered in the form of 'certain principles' indicated by 'the work accomplished so far'. Two aspects

were mentioned: firstly, that the main prerequisite was for some 'core or spine' of knowledge and skills or both 'albeit in a wide range of proportions according to circumstances or purpose' (ibid: para 62); and secondly, that this core or spine and the separate modules should be described in ways which made it clear how they related one to the other. It was then 'quite possible to build a number of distinct and coherent programmes, each with a definite core and title, drawing on a 'bank' of modules (ibid: para 64).

Course duration

Equally problematic as the definitional debate has been the narrower question of course duration. The first bulletin expected Access Courses 'in most cases' to involve 'at least' 500 hours' 'total study time' with the 'possibility' of 'advanced standing' (CVCP and CNAA, 1989a: para 17); the second bulletin specified allowance for 'offsetting' through 'credit for prior learning' (CVCP and CNAA, 1989b: 18d); and in the third bulletin the 500 hours duration was described simultaneously as an 'illustration', as a 'benchmark' and as a 'minimum'. Although it was the achievement of 'course objectives' which was more important than 'course length', there was 'a relationship' between these two elements which required the determination of a 'baseline' to indicate 'what is needed to deliver the intended outcomes' and around which AVAs (and admissions tutors in higher education) would operate.

In the light of 'inconsistency' in the way applicants had dealt with the published guidance, the third bulletin also reported that this area 'will be kept under review' (CVCP and CNAA, 1990a: para 41). Accordingly, in the fourth bulletin, 'the current judgement of the ACRG' was that 'kitemarked Access Courses normally involve a minimum of 500 study hours, including private study, project work and contact hours to justify inclusion in the national register' (CVCP and CNAA, 1990b: para 42). Access Course providers and AVAs were again 'reminded that allowances may also be made for the possibility of admission with advanced standing, and for the accreditation of prior learning' (ibid: para 45). Whatever the precise formulation and without additional justification, the usage in each of the bulletins has been to suggest types of provision – short preparatory programmes, fresh start and return to study courses – which were likely to fall outside the framework. This distinction was common, if contested, prior to the arrival of the framework and was now to be routinised in the orthography of 'A'ccess and 'a'ccess courses.

Some members of the central body were unclear about where the 500 hours guideline had originated: 'It just slipped in, people didn't

seem to realise it was contentious'; 'It is difficult to say how it came about – it was based on the notion of a full-time, one-year course'. One member was more categorical: 'It was pushed on us – it did not arise from discussion. I was unhappy about it then and I remain so'. Those who identified with the 500 hours guideline explained their support in terms of the three approaches outlined ealier:

- ☐ those who took a student-oriented approach saw it as 'part of the guardianship over the promise to the students'; 'it came out of a genuine struggle to define adequate preparation and be fair'; 'we have a responsibility to endorse credible provision for the widest group'
- ☐ those who held to a standards view saw it as being about 'holding the line on standards'; 'I would have preferred to be more dogmatic on this but the experience of the committee was that it varies a lot between subjects'
- ☐ those who were more task-oriented saw it as 'a definitional device to clarify the boundary of the task'; '"at least 500 hours" meant that we were not concerned with return to study-type courses'; 'you've got to have some framework for comparability'.

Some, however, had reservations: for example, it was 'tending towards time-serving'; 'it will become the starting point for curriculum development'; and 'it's too prescriptive and excludes people who are employed'. Others felt that 'it has beem misunderstood - it's really a moveable feast' and 'although it started as "students to do 500 hours", it has become "500 hours available to students" – the latter is established but not clear to everyone yet'.

Certification and grading

While the issue of course definition and duration was troublesome from the beginning, that of course certification and grading surfaced only later as a source of unease. In the first paper published by the central body, it was made clear that students who succeeded in a validated course would gain a 'locally determined Access Course certificate of achievement, stating that the course is recognised by CNAA, BTEC and the universities' (CVCP and CNAA, 1989a: para 21e). In addition, AVAs were asked to give attention to 'appropriate certification, including profiles or records of achievement when considering the validation of individual courses' (ibid: para 26l). However, the third bulletin noted with dismay that a number of submissions 'included assessment schedules with graded passmarks'. Such practices were felt to be 'outwith the ACRG's guidelines and spirit of Access Courses' (CVCP and CNAA, 1990a: para 44) and

henceforth the standard conditions of approval for AVAs would specify that 'no grading should appear on the formal certificate awarded to the student'. Any grades achieved by students were to be provided 'separately on request' and the AVA might provide 'an accompanying transcript or record of the student's particular achievements' (ibid: para 45).

In some AVAs this requirement caused consternation for two reasons. Firstly, it was seen as a problem in relation to those students who did not quite meet the standard necessary for higher education but who had nevertheless made great progress. For these individuals apparently the only alternative to a 'pass' was a 'fail', and this was considered inappropriate. Alternatively, some saw it as a restriction on their desire to give some recognition to students who had done very well but who could be awarded no more than a pass. Some had taken it to mean that they could not award grades in different subject areas and that this would disadvantage students in the applications process, since admissions tutors might look for different levels of performance in some areas to match specific requirements in higher education.

In the fourth bulletin, the ACRG sought to clarify its position by restating that no grading should appear on the certificate but that AVAs might provide an accompanying profile or record of achievement. It went on to point out that this did not necessarily mean 'failing' students as 'the agency may also maintain its own arrangements for certification of student achievement, even if this does not amount to successful completion of a recognised Access Course' (CVCP and CNAA, 1990b: para 39). Put another way, the national kitemark was there to signify a programme of studies and a level of attainment consistent with general entrance requirements in higher education: the framework 'does not seek to go beyond this' and admissions tutors in higher education 'will still need to employ appropriate criteria in selection of students for particular courses' (ibid: para 40).

There were those in the Consultative Committee who felt that this provided a loophole through which 'some courses which are very like A-levels will be approved' and 'it is unlikely that we will influence the AVA to change them fundamentally because they are well established. I can see the principle slipping away'. It was also apparent that not all AVAs were clear about the position of the ACRG on this matter and how, if at all, they should change their practice.

2.3.5 Target groups and equal opportunities

Three out of the five objectives and main features included in the definition of Access Courses to be embraced by the framework scheme

referred to the general characteristics of the groups to be targeted and recruited by such programmes. The first two bulletins followed the White Paper of 1987 in stating that Access Courses provided 'mainly' for mature students and catered for those who did not hold conventional entry qualifications. This source was formally acknowledged in the first of these documents and the demographic and workforce priorities which informed the White Paper were summoned up briefly to remind higher education institutions of the need to increase participation 'by admitting those offering other qualifications and experience' (CVCP and CNAA, 1989a: para 19a). Unlike the White Paper, however, these same documents placed considerable emphasis on the way Access Courses were designed and taught to meet the 'needs' of particular audiences; namely, individual learners 'who do not yet feel ready for direct entry to higher education' and 'specific groups' who were 'in the community' and 'under-represented in higher education' (ibid: para 16).

In their principles and procedures of operation, the AVAs were expected to 'allow for the particular local and regional characteristics of individual Access Courses' and to 'look to the closeness of the course to the needs of the students it seeks to serve' (ibid: para 23g). Again, in order for an Access Course to be recognised for a kitemark there would need to be 'effective links between the Access Course and the group(s) in the community which it is designed to serve' (ibid: para 25f). Other criteria to be considered in the recognition of Access Courses repeated these learner-centred and community-related themes: 'the relevance of the curriculum to the needs of the local target group' (ibid: para 26b) and 'the extent of local community involvement' (ibid: para 26f).

The broader question of equal opportunities was addressed initially and mainly in connection with the ability of Access Courses to 'target' under-represented groups, to demonstrate effective community links, and to offer a curriculum shaped to local needs and circumstances: a set of purposes and practices 'thereby facilitating the implementation of equal opportunities policies' (ibid: para 16d). While the latter was proposed as a key principle underlying the validation and recognition of Access Courses, a stronger formulation – the need to demonstrate 'the effectiveness of the programme of studies in promoting equality of opportunity' – was identified as an issue 'supplementary to the matters of principle' (ibid: para 26c).

Most members of the central body felt that equal opportunities had been embraced as a principle because there were 'strong feelings that it was fundamental to Access but, because we don't want to be about excluding people, we have not gone too hard on it'. Others

thought 'it has become an absolute criterion' and 'the ACRG has done a lot to raise it as an issue'. There were however some reservations: 'there are some very bland statements being made in submissions and I wonder whether they are really doing anything'. Others were worried that 'there is slippage' and that 'ACRG does not address the issue in its own or in AVA activities and processes'. On the other side, some members pointed out that 'we must address equal opportunities as an academic issue – it's about targeting Access provision – not a political issue' and that 'academic standards should have priority'.

2.3.6 Quality assurance and standards

The general question of quality assurance and the particular issue of safeguarding 'standards' was central to the origin and foundation of the framework. Clearly, the responsibilities of the central body in approving and reviewing AVAs along with the principles and procedures to be applied in the validation of courses must be considered, in the widest sense, all dimensions of quality assurance. At the first meeting of the Athenaeum group adequate arrangements for quality assurance were seen as 'crucial' to the achievement of wider currency for individual Access Courses: validation arrangements were to be 'handled locally but in accordance with a set of fundamental principles to be established centrally' and holders of a 'franchise' to validate Access Courses were to be subject to 'review' by the central body (Convening Group, January 1988). And within the Steering Committee it had been suggested that, for example, AVAs might supply key parts of definitive course documents to the central body and that this body should keep records of the appointment of external moderators and receive copies of their reports. There was even a suggestion that the central body 'approve' their appointment (Steering Committee, October 1988).

In some contrast to this interest and intent, the first two bulletins were noticeably mute on the question of course-related dimensions of quality assurance – 'there will be sound arrangements for quality assurance' (CVCP and CNAA, 1989a: para 25g) – and such issues as 'the appointment of external moderators' (ibid: para 26m), 'appropriate course monitoring and review procedures' (ibid: para 26n), 'adequacy of student records' (ibid: para 26o) and 'appropriate course records and documentation' (ibid: para 26p) were listed as 'amongst the criteria to be considered' in the conduct of validation (ibid: para 26). Indeed, 'a variety of arrangements of quality assurance' (CVCP and CNAA, 1989b: para 5) were envisaged and at the level of the course (and the student) quality assurance was to be exercised mainly through the 'external moderator' role – 'ongoing course review, pro-

viding advice to the course team and validating agent, acting as intermediary on behalf of individual students' – although provision for the 'external examiner' role 'might' be included in the system of assessment agreed between the Access Course provider and the validating agency (ibid: Glossary).

However, the position adopted in the third bulletin was somewhat different and the length and strength of the guidance was much increased. In order to give higher education establishments 'a signal of quality assurance and appropriate standards' (CVCP and CNAA, 1990a: para 13) and arising from 'ACRG's experience to date', the revised format for AVA applications requested 'details of arrangements to cover the duties of moderation and external examining' (ibid: para 22) and the standard conditions for approval included the requirement that AVAs specify the 'responsibilities and duties of moderation and external examining' (ibid: para 50). Both roles were now seen to be 'essential contributors to quality assurance in Access programmes' and:

> *'Further consideration prompts the ACRG to advise AVAs that they should build the external examiner function into their validation conditions and arrangements. Without direct reference to this function, the arrangements for quality assurance might be open to challenge, not least in respect of student appeals' (ibid: para 43).*

The emphasis on the 'external moderator' role in the original guideline would appear to have reflected the early history of a number of Access Courses where admissions tutors and course directors in higher education often acted as 'proxies' for the 'external examiner' function and this in turn had permitted a 'different' or 'wider' role to be developed in the name of the 'external moderator'. Because the national framework was 'designed to embrace and recognise freestanding Access programmes', the 'external examiner' function had therefore to be seen 'to confirm the level of the "award" and to oversee the conduct of assessment' (ibid). This had been considered appropriate even though (or because of) 'the vast majority of Access Courses have built-in links with higher education institutions' (ibid: para 14).

For members of the ACRG, the issue of external moderators and external examiners 'has emerged, it wasn't there at the beginning'; 'we all started with our own assumptions – it was only as we discussed more submissions that it emerged that people had very different assumptions and that there were very different models in practice'. Another member put the difficulty another way: 'There are two strands – one is about academic standards. HE knows what they are and is the guardian of them. The second is that those closest are best

able to assure quality because quality assurance is an on-going process. You have to trust professional colleagues within a framework of accountability. It's the tension between these two strands that has led to the muddle'.

The guidance in the fourth bulletin was an attempt to clarify the situation, stating that 'the ACRG does not require that there should be both a moderator and an external examiner for each Access Course' but that there were specific duties and activities which needed to be covered 'one way or another' (CVCP and CNAA, 1990b: para 49). In the same section the notion of externality was also developed:

> *'For a single institution agency, the moderator/external examiner will usually be external to the provider college and to the "linked" HE institution. In a consortium, the external examiner/moderator will normally be external to the provider institution and to any HE institution to which there is a direct link/progression route' (ibid: para 52).*

> *'In practice both moderators and/or external examiners may be drawn from those with expertise in either the further education (FE) providing sector, from appropriate HE institutions, or from others with relevant and authoritative experience' (ibid: para 53).*

The issue was to cause some concern and frustration within AVAs. Several were operating in ways they had declared in their submission to the ACRG and on which basis thay had been approved but these were not necessarily in terms which accorded with the guidance in the third and fourth bulletins. Externality was perceived to be particularly problematic in principle and in practice; and AVAs had asked themselves whether they should, as well as whether they were supposed to, change what they were doing.

In addition to 'the activities, roles and duties associated with moderation and external examining', quality assurance processes were to 'rely' on 'annual course monitoring', 'annual reports to the AVA' and 'periodic review' of the Access Course 'normally after 3, 4 or 5 years' (ibid: para 48).

2.3.7 Collaboration and competition

As noted earlier in the discussion of the planning period, the importance to be attached to collaboration in the operation of the framework and in the process of validation and review had changed between the first and second bulletins. The subject of this shift was the relative merits of single institution and consortia models of AVA. These alternative types of agency were only described in the initial statement of

principles but in the subsequent invitation to apply these models were compared more directly. Consortia arrangements were seen to have particular advantages in facilitating collaborative relationships – transbinary as well as between higher education and further education – and in avoiding unnecessary competition. The result has been that 'Several of those who sent statements of intent, subsequently agreed to subsume their bid within a consortium or joint application': a development which the ACRG has encouraged 'wherever possible' (CVCP and CNAA, 1990a: para 32).

Problems 'latent' in some proposals from single institution agencies were ventilated in the fourth bulletin: the tendency 'to key their Access Course recognition procedures far too closely into the existing mechanism that operates for degree courses' and the tendency 'to style the agency under the same title as the institution itself' (CVCP and CNAA, 1990b: para 56). However, the ACRG did recognise the particular difficulty which universities and polytechnics faced in relation to their statutory structure and it sought to reaffirm its position that 'single HE institutions *can* provide, in partnership with providers, the basis for successful AVAs' (ibid: para 54).

While the principle of collaboration has been profiled in the development of the framework, discussion of the role and place of competition has also been apparent. Although it was 'not intended to set up local areas of control for particular validating agencies' and any Access Course provider had 'the right to approach any validating agency' (CVCP and CNAA, 1989a: para 4), it was nevertheless:

> *'hoped for the sake of simplicity and economy that a sensible pattern of arrangements for validation will emerge in each geographical area' (CVCP and CNAA, 1989b: para 13).*

Access Course providers who wished to see their course acquire a kitemark were advised 'to develop a relationship with an intending agency' and 'CNAA would be pleased to assist providers by putting them in touch with possible validators' (ibid: para 14).

The most direct reference to competition concerned a fear that individual institutions which were already part of a consortia might apply for a franchise on an individual basis. Within the Steering Committee it was 'hoped to deter' an institution which sought to place itself 'in competition with its consortium' (Steering Committee, March 1989). Membership of more than one consortium AVA was acceptable on the other hand, so long as the formal relationships of the institution were 'clear' in each case (CVCP and CNAA, 1990a: para 24).

Notwithstanding the role of the central body in facilitating local discussions between intending AVAs 'if it is discovered that there is

a prospect of unnecessary duplication' (CVCP and CNAA, 1990a: para 22), in reserving the right to put those AVAs with experience to the front of the queue, in encouraging appropriate collaboration, in expecting most Access Course students to continue to progress to linked higher education institutions, and in ensuring that no single AVA would be given a monopoly in any geographical area, the ACRG was 'not a planning body' (ibid: para 24). The three key principles subscribed to by the ACRG – 'devolution', 'lightness of touch' and 'partnerships' (CVCP and CNAA 1990b: para 6) – were to be set against any tendency to central direction, intervention or prescription in the operation and evolution of the scheme.

Among the members of the central body there was a general acknowledgement that the principle of collaboration had been applied more strongly as the scheme had progressed. Some were 'more comfortable' with the stronger stance, and saw it as a 'good thing, otherwise FE can opt out – it's a metropolitan attitude that FE is banging on the door'; 'we are now picking up the FE balance in AVAs more strongly' and 'I now wish we had not allowed single institutions'. Others believed it had gone too far: 'it is becoming very prescriptive; 'it has become a fetish'; 'it's got out of hand and become a theological issue'. The change was attributed to two main factors. More recent applications often seemed less experienced in their collaborative arrangements and some institutions (further education and higher education) had appeared in more than one submission. Hence more attention had focused on the reality of the partnerships claimed. The unevenness in the application of the principle of collaboration was seen by some as an inevitable consequence of the evolutionary nature of the policy process and one which did not necessarily present major problems – 'review will pick up inconsistencies in earlier approvals'. On the other side were those who believed the scrutiny 'could have been done more rigorously' and pressure applied through 'strong recommendations'.

The declaration that the ACRG was not a planning body had also become an issue for some members. Although most agreed with this in principle, they recognised that the central body 'must have regard to issues of a planning nature'. A number were concerned that questions about competition and planning had not been sufficiently or openly addressed: 'We all know it's not a free market – we can't say we're not planners. It has become an excuse for not thinking about it'. In particular, dual or plural membership of AVAs was seen as problematic: 'it has to be monitored – it's nonsensical'; 'competition is developing between AVAs touting for business – that's not what it is

supposed to be about'; 'we don't want lots of consortia with no students – we need to be credible'.

2.4 REVIEW PHASE

Overlapping with the operational stage and continuing through to the present has been a period of review and revaluation. Although still concerned with the business of AVA approvals – and with one troublesome case in particular – the ACRG has sought to 'take stock' of what had been achieved, plan for the next phase of work, and consider the future scope and direction of the framework. The pursuit of these objectives was to become progressively more difficult as changes external to the framework created greater uncertainty and as relationships within the central body came under increased pressure. At the same time, communication and consultation with the AVAs was able to be placed on a firmer basis and their close involvement in the design of arrangements for periodic review has helped the ACRG to move to 'a new phase, with a different work programme'.

2.4.1 Future operations

By the end of 1990, most applications for AVA status had been dealt with by the ACRG and only a small number were still 'in the pipeline'. Before proceeding to the next phase of work – the periodic review of AVAs – the ACRG took advantage of a 'lull' in activity to reflect on the overall development of the framework, including 'future phases of ACRG's work and operations, and a possible widening of its responsibilities'. While it was of 'first importance' to consolidate the work originally identified for the ACRG and to give priority to the planning and operation of periodic reviews, it was also important to consider 'certain convergences and connections' and 'a broader canvas' of access routes which might be recognised within a wider framework (ACRG, January 1991).

This opportunity to reflect on the 'challenges' facing the ACRG was also prompted by the need to review the membership of the ACRG and it coincided with an internal reorganisation within the CNAA which located the ACRG alongside the Credit Accumulation and Transfer Scheme (CATS) in a new Division of Institutions and Programmes.[6] The significance of CAT principles and structures in making the framework 'more flexible and broad' had been emphasised in separate briefing papers presented to the ACRG by the Joint Secretaries, but there were 'mixed feelings' among members. While it was acknowledged that 'credit ratings' offered a means of recognising

a wide range of access pathways, it was not obvious that the ACRG was the right body to take this on. Indeed, there was a strong feeling within the ACRG that 'wider access' was best addressed through 'local' initiatives, especially at the level of the AVA, and that the main concern of the central body remained the 'currency' of Access Courses: 'Evidence of success was still to be assembled' and 'there remained much work to be done', especially in raising the confidence of admissions tutors in higher education. As before, 'The key prize was to break down the near monopoly of A-levels as standard criteria for admissions to HE' (ibid).

It was accepted therefore that the ACRG should first consolidate its present role but 'despite reservations' it was also agreed that it should 'consider the possibilities of expanding its remit, with a key purpose to "mainstream" a range of alternative access routes not currently perceived as such, and thereby to bring real benefits to students' (ibid). A Planning Group composed of members of the ACRG was convened for this purpose in March and a meeting of the Convening Group was arranged in July to receive proposals about the future role and operations of the ACRG. At the Planning Group, the case was made again for a CAT-based scheme of national recognition which would extend the framework beyond the kitemarking of Access Courses and embrace a range of alternative access routes, including: arrangements for direct entry for those without formal qualifications; programmes of study which included credit for prior learning; in-company courses and employment-based programmes; distance learning programmes and open learning packages; the foundation year within a four-year (or two-plus-two) degree programme; preparatory and conversion courses for overseas students; and 'youth access' programmes for those progressing from Youth Training schemes.

The discussion paper *Exploring the frontiers* which emerged from this group and which was presented to the ACRG and the Convening Group accepted that the creation of an over-arching framework for credit rating was 'too big a job for ACRG itself'. However, any such framework 'might well draw from ACRG's principles and experience' and, given that 'the identity of Access Courses remains under review' and the work of the central body 'is still evolving', the inclusion of these other programmes within kitemarking arrangements 'would represent a model of consolidation for ACRG, involving marginal adjustment to the frontiers of work currently undertaken both centrally and by AVAs'. Furthermore, to hold back on these developments would be to deprive students of 'real benefits':

'The exclusion from national recognition of some alternative access

routes devalues these programmes and restricts opportunities to the students. This is rightly cause for concern' (Convening Group, July 1991).

2.4.2 Changing contexts

In the event, discussion of these proposals was to be temporarily overshadowed and significantly affected by the publication in May 1991 of two White Papers on education, both with major implications for the future of the framework, the ACRG and the AVAs. The White Paper *Higher Education: A new framework* (DES, 1991) proposed a single funding structure and a common framework for quality assurance for universities, polytechnics and colleges. More particularly, the new arrangements for quality assurance were deemed to leave 'no major role' for the CNAA and provision was to be made for the Council to be wound up. In advance of abolition, the Council was asked to consider with the institutions and the funding councils 'the best future location' for some of the services currently provided, including credit accumulation and transfer schemes, the promotion and dissemination of good practice and 'the recognition of access courses' (ibid: 28).

The second White Paper, *Education and Training for the 21st Century* (DES, Department of Employment and Welsh Office, 1991, Volumes I and II), proposed a similar and parallel funding structure for further education which, although mainly concerned with provision for 16- to 19-year-olds, would provide support for specific categories of full-time and part-time education for adults: 'access to higher education' and 'access to higher levels of further education', as well as courses leading to National Vocational Qualifications, GCSEs, AS- and A-levels, acquisition of basic skills (literacy and numeracy), proficiency in English for speakers of other languages, and programmes for adults with special educational needs (ibid II: 8). 'Other provision' was to be supported 'so far as possible' mainly through fees (ibid: 9).

Both the White Papers were considered by the ACRG in June and a formal response to the White Paper on further education was made to the DES in July. Although Access Courses and arrangements for their recognition were mentioned only briefly in the White Paper on higher education and not at all in the White Paper on further education, many of the proposals had 'clear implications' for the future of the framework. The most immediate concern was to secure continuity in the work of the ACRG while discussions were held about the transfer of services from the CNAA and about the future location and 'ownership' of the central body. It was considered 'unfortunate' that no mention had been made of the role of the CVCP in the recognition of Access Courses and, with the demise of the CNAA, it was suggested

that other 'owners' and 'partners' be sought, initially the Committee of Directors of Polytechnics (as the equivalent body to the CVCP) and later perhaps a representative body from the colleges in the new further education sector (ACRG, June 1991).

Alongside plans to remove further education colleges and sixth-form colleges from local authority control and to establish funding councils for the new sector, the White Paper on further education aimed to achieve full equality of status (and standards) for 'academic' and 'vocational' qualifications through a new system of Ordinary and Advanced Diplomas. Furthermore, 'general' national vocational qualifications (GNVQs) were intended to be developed within the NVQ framework in order to offer 'a broad preparation for employment as well as an accepted route to higher level qualifications, including higher education' (DES, Department of Employment and Welsh Office, 1991: 19). In its response to the White Paper, the ACRG welcomed the proposals for widening access to higher education, but was 'disappointed with the narrowness' of the approach adopted: no reference had been made either to Access Courses as a 'third route' into higher education, or to the experience of the ACRG and its network of AVAs in developing a framework of national recognition as outlined in the White Paper on higher education in 1987; and only 'marginal attention' had been given to the interests of adult learners 'who are arguably a majority within FE colleges and an ever increasing proportion of students in HE institutions'.

The distinctions drawn in the White Paper between different kinds of education for adults – between courses leading to qualifications or career advancement and those undertaken for 'leisure interests' – were described as 'artificial and unhelpful' and as posing 'a formidable threat' to the form of access and progression facilitated by open college and other collaborative schemes. The new funding councils for further education and for higher education needed to take into account the extent of cross-sector collaboration and inter-institutional co-operation, especially the resourcing provided by local education authorities for authority-wide Access programmes, for AVAs and, more critically, for open college networks:

> *'A high percentage of all Access programmes, and courses kitemarked for the ACRG, are organised through Open College networks'*

and

> *'ACRG is surprised that the White Paper makes no mention of OCNs, their substantial role in relation to adult basic education as well as access to higher education, and the current impetus for new OCN schemes in many LEAs' (ACRG, 1991: para 10 (viii)).*

The meeting of the Convening group had been rescheduled to take account of the publication of the White Papers and to provide an early opportunity to plan for the 'new context'. As in the ACRG, members advocated 'a period of stability' and a focus on those areas which were funded for at present: the periodic review of AVAs; the consolidation of the 'currency' of Access Courses with admissions tutors in higher education; the compilation of a register of recognised Access Courses; and the development of mechanisms to support and consult with AVAs. The planned review of the membership of the ACRG in December 1991 was postponed and current members were invited to serve for a further two years. On the other hand, the Consultative Committee was to be stood down and replaced by a new body, the Standing Conference of Authorised Validating Agencies (SCAVA), which would 'act as ACRG's mechanism for consultation with practitioners' as well as 'having a life of its own'. In addition, a separate register or panel of 'specialist practitioners' was to be established to support the ACRG in its formal and regulatory functions, such as membership of groups undertaking periodic reviews of AVAs. And finally, it was considered 'too soon' to discuss the future location and ownership of the ACRG, although the CDP was to be invited to nominate one of its officers as an 'observer' to that body (Convening Group, July 1991).

This was the position which obtained at the conclusion of the study in August 1991, and a climate of apprehension and uncertainty pervaded the work of the ACRG over the following year, reflecting the wind-down of the CNAA. Since the meeting of the Convening Group in July 1991, the ACRG met on only three occasions and 'slippage' occurred in the work programme proposed for 1991–92. The PCFC and the UFC had agreed in principle to continue funding the ACRG after September 1990 (they had been 'put in funds' by the DES for this purpose) and an 'enhanced' budget for 1991–92, as supported by the Convening Group, was still 'under discussion' at the end of this period. Both the Convening Group and the ACRG had endorsed a work programme which distinguished between 'ongoing' and 'new' work, the latter being concerned with 'identifying good practice', 'exploring the frontiers' and 'investigative studies'. A bid for the full work programme was to be presented to the funding councils, although the 'new' component was also to be the subject of 'parallel proposals' to other funding bodies.

Slippage was therefore 'inevitable' and completion of the agreed work programme for 1991–92 was declared 'impossible' since this had been based on provision for an additional professional officer to join the ACRG secretariat. As a consequence, the intention to publish a

fifth bulletin was dropped, the publication of a national register of recognised Access Courses was further delayed (printing and distribution had been planned for the summer of 1992), and the proposed schedule of periodic reviews up to March 1993 had to be revised (and redescribed as 'exploratory') given 'insufficient money' in the current budget to cover the costs of a full programme.

In October 1991, proposals for setting up a 'quality assurance and access organisation' to replace the CVCP Academic Audit Unit as well as the CNAA were submitted to the DES by the CDP, CVCP and SCOP. These envisaged three 'functional arms' for the new post-binary organisation: a quality audit unit; a quality enhancement unit; and a credit and access unit which would assume responsibility for the CNAA CATS and 'the functions currently being carried out under the aegis of the Access Courses Recognition Group' (CDP, CVCP and SCOP, 1992). The tensions, difficulties and delays experienced in the drawing up of these plans, and reproduced elsewhere (and more publicly) in discussions between the CDP and the CVCP and between the Polytechnics Central Admission System (PCAS) and the Universities Central Council on Admissions (UCCA), were close to the surface in many of the exchanges in the ACRG at this time. The degree of consensus achieved within the central body in the planning and operational stages of the framework was to come under considerable strain in the review phase, as the polytechnics (now able to use the title of university) asserted their independence of the CNAA and as the universities, polytechnics and colleges assumed responsibility for decisions concerning the future of the ACRG.

At what proved to be the last meeting of the ACRG in June 1992, it was announced that the work of the ACRG was to be subsumed within the Division of Credit and Access in the new Higher Education Quality Council established and controlled by the institutions of higher education themselves. The Chair of the ACRG, Professor Peter Toyne, had agreed to oversee developments in the Division of Credit and Access, 'with the proposed CATS Task Force as its central component'. Work on the new arrangements was 'only just starting' and 'no details of structure and operation had been worked out as yet'. Advice was to be prepared for the HEQC 'for the work of the ACRG to continue' but the need to retain a discrete 'group' with responsibility for this work within the new Division was a more open question. Whatever the form of future arrangements, 'this was probably the last meeting of ACRG in its present form' (ACRG, June 1992).

2.4.3 Consultative mechanisms

One of the ironies to be observed during the later development of the

framework was the way communication and consultation with the AVAs were able to be placed on a firmer basis at the same time as the position of the ACRG began to be disturbed and later challenged by external events. The interim report of the evaluation study commented at some length on the way the central body had moved swiftly and directly to establish the framework – without the need for a period of consultation and on the basis of a reading of AVA documentation – and how the Consultative Committee was unable either to meet separately or consult widely.

With the early and heavy rounds of AVA approvals completed and at the instigation of the Joint Secretaries, the ACRG moved into a more 'consultative mode': 'members wished to develop further mechanisms for consultation amongst AVAs, between AVAs and ACRG, and between ACRG and those outwith the Consultative Committee whose experience, expertise, interests and ideas would be of assistance to ACRG' (ACRG and Consultative Committee, March 1991). A draft of the fourth bulletin (itself designed to offer feedback on experience to date) was distributed to members of the Consultative Committee for comment, a joint meeting of the ACRG and the Consultative Committee was convened in October 1990 to discuss the preliminary findings of the evaluation study, and a liaison meeting between members of the ACRG and representatives of the National Open College Network (NOCN) was held in the following month.

The major impetus for this interaction and dialogue was the need for the ACRG to prepare for periodic review of AVAs, a process to be undertaken 'in conjunction with representatives of Access Course providers and the validating body concerned' (CVCP and CNAA, 1989a: para 22b) and conducted 'after consultation with each institution' (ibid: para 22f). The importance of consultation as well as collaboration in the planning and operation of periodic review had been acknowledged from the beginning and the ACRG was conscious of the early experience of the CNAA in this respect:[7]

> *'There was concern to ensure that AVAs themselves fed in ideas for the processes of periodic review, and that there should be no reversion to "old-style" CNAA procedures' (ACRG, January 1991).*

Arising out of discussions at the joint meeting of the ACRG and the Consultative Committee in October 1990, the idea of a 'standing conference of AVAs' was proposed. Arrangements were made for a 'pilot meeting' in March 1991 and, although convened and organised by the ACRG, it 'was to be an event for the AVAs themselves' (ibid). At this meeting, the concept of the SCAVA was supported, its position as 'an autonomous body side by side with ACRG rather than subor-

dinate to ACRG' was endorsed, and two small working parties were formed to develop ideas on the constitution and terms of reference of the SCAVA and on the processes and criteria for periodic review. Although the meeting 'did not produce a lot that was new thinking', the importance of the event was the opportunity 'to start building up a sense of involvement in and identity with ACRG, and ideas on what might be achieved through collaboration between AVAs'. For the ACRG, it was a stark reminder that AVAs were at very different stages of development and that representatives were 'ranged across a very wide span of experience':

> *'For some this was the first time they had had contact with other AVAs. For them their experience was recent and limited to particular models of Access Course design, delivery and validation. Their main aim was to learn more about others' experiences, and to put their work in a wider context. This contrasted with the position of other participants, whose AVAs are long standing in experience and expertise, at the cutting edge of new developments and bringing with them a crowded agenda of items for ACRG's attention. There was a clear message that ACRG (and its secretariat) should not assume that AVAs share all of the thinking and conventions of those who are leaders in the field. There is a good deal of catching up to be done by some. The sophisticated debates on some items of the access agenda, and on expanding horizons for ACRG's future developments, might be lost on some people whose participation and understanding are essential' (ACRG and Consultative Committee, March 1991).*

Despite some concerns about the need to avoid bureaucracy and for 'clarity' in the ultimate responsibility of the ACRG itself for standards – 'a responsibility which could not be delegated' (ibid) – members welcomed the development of the SCAVA, especially that part of its role 'as a consultative mechanism for ACRG' (ACRG, June 1991). To facilitate and strengthen this link, the SCAVA was invited to make nominations for six places on the new 'Specialist Panel' established by the ACRG in October 1991. The Specialist Panel was to comprise all ACRG members, assessors and observers along with members of the existing Consultative Committee and the SCAVA nominees. Like the ACRG, members of the Specialist Panel (some 46 individuals) were appointed for a term of office up to December 1993. Decisions about further co-options were intended to be taken in 1992 but these were deferred 'given the uncertainties about ACRG's position and the new organisation likely to be created' (ACRG, February 1992).

The SCAVA was officially launched at a meeting in Birmingham in December 1991. This and other annual meetings of the SCAVA were

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to be resourced through the ACRG while general meetings were to be serviced by the ACRG secretariat. Membership of the SCAVA was to be open to all AVAs and each was entitled to send two representatives to general meetings. Since the launch of the SCAVA, three national gatherings had been held (one on the implications of the Further and Higher Education Act; one on the 'frontiers' of Access Courses to higher education; and another on the HEQC and future arrangements for Access Course recognition) and a survey had been undertaken of the resources available to AVAs in order identify what range of services were provided and what were their 'real costs'. The status of AVAs and the SCAVA, and 'the precarious position over ongoing resources faced by so many AVAs' (ACRG, June 1991), were to be brought to the attention of the new HEQC Division of Credit and Access.

2.4.4 *Periodic reviews*

From the outset, the cycle of periodic review to be applied to AVAs 'at intervals of not more than four years in the first instance' (CVCP and CNAA, 1989a: para 23e) was seen as central to the authority and integrity of the framework, underlining 'confidence' in systems and standards, and underpinning the 'currency' of Access Courses. It was also at this early stage that consultation and collaboration were identified as necessary elements in the conduct of reviews, and that 'analysis of processes of operation' would be based on two main sources: '(a) records and information of Access Courses collected by the designated central body; and (b) the authorised validating agency's report or self-appraisal of its processes and experience of validating Access Courses' (ibid: para 23f).

These arrangements mirrored certain features of institutional reviews and accreditation reviews conducted by the CNAA, where self-evaluation and peer review were key dimensions but with an 'external' reference always provided by the regulatory body. When members of the central body began to address these questions, perceptions differed about the purpose and character of periodic review. Some saw it as crucial: 'if the follow-up is not seen to be sound, the whole system will be discredited and it will give those resistant institutions the excuse to pull back'. Others saw it as a practical progression of the current work: 'it will pick up any inconsistencies in the approvals'. Members were equally divided about the way the reviews needed to be conducted: 'it will have to be much tougher and tighter than this round'; and 'it should be tougher, not necessarily more prescriptive, but clearer about good and bad practice on the key issues'. Others expressed a contrary view: 'the review won't be

tougher – the days of inspection are over. It must operate on trust based on confidence that systems are in place' and the ACRG 'will never be able to monitor closely; in the end you depend on the professional integrity of people in the field and the review will have to pursue it that way'; 'it won't need to be tougher – if AVAs have been effective between approval and review the evidence will appear, it will be easy to know'. Others again saw it more in terms of being different: 'the originals were often about plans rather than current practice and it will be about making sure that they are responding to changing climates and markets'; 'review will have to take a closer look at what is actually being done'; 'it will need to address the resources issue because it will be difficult for some to survive'.

The way the review might be conducted also elicited a variety of responses, although at this stage people were only just beginning to think about it in any detail. One member assumed that 'it will be a paper submission with a visit of the AVA to the ACRG' but another saw it as a more open question: 'ACRG needs a sound method of making sure that AVAs have a sound method'. Others speculated about whether the ACRG was the most appropriate body to do it: 'if the guidance was tighter then it's an officer job to see that the criteria are being met and only by exception need it go to the committee; that would be much more efficient'; 'it should be done by representatives of the AVAs; in other words, by peer group review. ACRG is pushing that but not open to that itself'; 'the review might be better done by others – people who are closer'.

Interestingly, these differences were to be reduced and some anxieties allayed by the participation of the SCAVA and representatives of the AVAs in the planning process leading up to the first periodic reviews in the spring of 1992. The working party established at the 'pilot meeting' of the SCAVA to develop criteria for review reaffirmed the importance of 'the AVA's own self-evaluation and its own responsibility for demonstrating how it is monitoring and evaluating its own activities'. More specifically, the working party recommended:

> *'that review should be based on the AVA's own processes of self-evaluation with the aim of checking its performance against its own stated aims and first principles of the ACRG published in the Bulletins.'*

and

> *'that broad general criteria should be produced which would be applicable to all AVAs. For the review of any individual AVA, however, an Agenda would need to be established which would also*

> *take account of the conditions of the AVA's "contract" with ACRG as well as its particular circumstances and stage of development' (ACRG, June 1991).*

As might be anticipated, the checklist of criteria proposed by the SCAVA gave prominence to 'equal opportunities' – in the processes of validation and review as well as in the structures and procedures of the AVA – alongside 'collaboration', 'quality assurance' and 'a catalyst for innovation'. Even though the criteria in respect of equal opportunities were new and not part of the original approval conditions, the checklist was considered 'acceptable' to the ACRG 'so long as it was not used in a prescriptive way'; 'It seemed geared to the most sophisticated of AVAs. Some AVAs with limited experience and modest remit would need to adapt the checklist to their own local circumstances' (ibid).

A 'draft' framework for the periodic review of AVAs 'based on principles established by the ACRG (and SCAVA)' was circulated to all AVAs for comment and, at the request of the ACRG, a revised and shorter version was to be prepared with more emphasis on 'systems of quality assurance (QA)' used by the AVAs and with 'a QA systems audit' as the focus of the review (ACRG, October 1991). These changes anticipated new arrangements for 'quality enhancement' and 'quality audit' within the Higher Education Quality Council and they were consistent with a new description of periodic review as 'the nucleus of ACRG's regulatory framework' (Convening Group, July 1991).

The key purpose of periodic review remained the 'assurance of quality and consistency' – enhancing the credibility of Access Courses and thereby bringing benefits to students – but other aims were also to be served: the provision of feedback to the ACRG ('keeping the central body in touch with practitioners') and the identification and transmission of 'good practice'. Moreover, the processes of review were intended to foster the development of the AVA itself, encouraging the agency to be 'self-critical', stimulating 'self-evaluation', and serving as a means of staff development (ACRG, 1992).

The revised version of the review 'framework' was issued to AVAs in April 1992 with 'an important preamble' stressing that the first sequence of periodic reviews would be undertaken 'with a clear understanding of the context and sensitivities to current uncertainties'. One of the uncertainties facing AVAs was the scope and scale of future funding arrangements and many AVAs were experiencing a worsening financial position. These were 'matters of acute concern' and the review document sought to reassure AVAs that criteria were to be applied with 'flexibility' and 'sensitivity' to the particular circumstances or the limited remit adopted by the AVA:

'A common core of criteria will apply to each AVA, but the programme and ACRG's expectations will be sensitive to the uneven pattern of AVAs' objectives and roles and the resources available to them, the variable circumstances which pertain across different regions, and a wide variety of Access provision with which AVAs are engaged' (ibid).

The procedures and criteria for periodic review were later published in a 'consolidated bulletin', which drew together material previously published by the ACRG and which was designed to be 'an *aide mémoire* and resource' for those involved with the framework (CVCP and CNAA, 1992a).

The structure of the periodic review of an AVA was to be 'determined by the ACRG, following consultation with the AVA' and was expected to be tackled in five stages. Firstly, a liaison phase to prepare for review and to consider the composition of a 'review panel' to be nominated by the ACRG 'after consultation': a group of no more than eight people, including an ACRG member and external nominees drawn from the ACRG Specialist Panel (one of whom would chair the panel) together with AVA nominees and representatives. Secondly, a planning phase involving face-to-face discussion with the ACRG secretariat to negotiate how the 'self-evaluation' conducted by the AVA was to be built into the review process and to agree the range of documents to be prepared and the format of meetings and events to be adopted for this purpose. Thirdly, a familiarisation phase whereby the ACRG nominees on the review panel would be invited to attend as observers at selected ordinary meetings or operations of the AVA. Fourthly, a 'formal event' – 'the culmination of the review process' – where the review panel would come together with AVA representatives to consider papers submitted by the AVA and reports back from members on their observation of AVA processes and operations. And finally, the preparation of one or more reports arising from the review event. This would be the joint responsibility of the ACRG secretariat and a representative of the AVA ('as negotiated in the planning phase') and would include a cover report prepared for the ACRG detailing any recommendations or actions to be taken by the central body (ibid). This cover report and appended reports from the AVA would be circulated in draft to the review panel and to the AVA before being submitted to the full ACRG.

The normal outcome of the periodic review was expected to be a continuation of the 'licence' (this term had now replaced 'franchise') to approve Access Courses to higher education but in 'extreme cases' the ACRG had the right to withdraw AVA status from the agency. If the outcome of the review report included 'significant criticism and recomendations for action' the AVA would be required to conduct a

further review earlier than indicated in the normal (five-year) review schedule.

The reviews to be conducted in 1991–92 were to be a 'pilot phase, allowing trial and experimentation from which ACRG might learn and develop improved arrangements'. Six AVAs had been identified for review in 1991–92 – some which had 'volunteered' and others which had 'an early progress review' (ibid) stipulated in their terms and conditions of approval – but in the event only two were able to be reviewed in that academic year (the South West Access Validating Agency and the Coventry Polytechnic, University of Warwick, Forum for Access to Midlands Education Joint Recognition and Review Steering Group).

2.4.5 *Problem approvals*

The ACRG was to continue to be involved with the business of AVA approvals throughout the review phase but at a lower level of intensity than previously and with increased reference to requests, reports and observations from approved AVAs. The standard conditions of the agreement between the ACRG and an AVA required the latter to notify the central body of 'any significant change in the circumstances or resources available to the agency' and in which case 'approval would need to be reviewed' (CVCP and CNAA, 1990a: para 50). Such 'variations' to existing arrangements were to include mergers, changes in membership, and changes in the 'model' of Access Course or form of validation specified as 'other conditions' in the letter of approval.

One awkward example of a secondary approval and another, more contentious and highly charged case of an initial approval were to reveal some growing tensions within the central body at this time. The first involved a request for 'advice' from the London Open College Federation (LOCF) about a proposal to subsume the four AVAs approved in inner London – Access to Learning for Adults, Central and West London Open College, Greenwich and Lewisham Education for Adults Network, and Open College of South London – into a single open college network. This reorganisation was necessary because of a reduced level of funding from local education authorities in inner London and would require the transfer of AVA status from the four AVAs to the LOCF.

Strong reservations were expressed by one member of the ACRG – who was also head of an institution of higher education in inner London – about the loss of 'a local dimension' (this had been a concern expressed at the time of the original approval of the four AVAs) and the need for the request to be treated as 'a separate proposal'. Other members were less exercised by the prospect of amalgamation and the

matter was referred to 'an exploratory meeting' between the ACRG secretariat and representatives of the LOCF, with an ACRG member as chair (ACRG, March 1991). The report of this meeting recommended approval of the LOCF as an AVA – 'this was not in the nature of a new AVA requiring a new submission, as the LOCF would inherit key points from the OCN's common structures, processes and criteria' – and the request was approved by the ACRG subject to 'a consolidating document' being provided, a requirement for an early periodic review and 'comments and recommendations to be drawn up by the secretariat' (ACRG, June 1991).

The level of disagreement expressed in this episode – where a personal interest was declared – was able to be managed and contained through the procedure adopted. Furthermore, a settlement was reached with the minimum of delay: an important consideration given the need for the AVA to arrange appropriate funding and undertake planning in an unstable environment. This was not to prove possible in the other example of a problem approval where numerous attempts over a period of nearly two years to deal with an application for AVA status from the Joint Matriculation Board (JMB) were to expose and sharpen differing perspectives and competing positions within the central body.

The JMB, along with the CNAA and the BTEC, was one of the validating authorities who were invited by the Forum for Access Studies in 1988 to outline their interests and intentions regarding the establishment of 'a comprehensive framework' for the recognition of Access Courses. The JMB through its Mature Matriculation Committee had offered since the mid-1980s an accreditation service to further education colleges for their Access Courses. Soon after the CNAA had been identified to take the lead in developing the initiative, the JMB made an unsuccessful request for membership of the Steering Committee and, later in the planning period, it was among the first group of organisations and institutions to apply for a franchise. Following a 'reference back, with a member level meeting' in November 1989, a resubmission in August 1990, a recommendation from the working party in Septmber 1990 that the proposal 'be not accepted', a decision by the ACRG to 'review' this conclusion in October 1990 and an intention by the ACRG to 'approve' in January 1991, the JMB was formally approved as an AVA in June 1991.

These various attempts to deal with an application for AVA status from a 'different kind of agency' – a university-related examining body with 'a distinguished reputation'; 'a central AVA' with 'an extended role' – had served to dramatise a range of concerns about the nature and purpose of the recognition scheme (ACRG, March

1991). The conclusion to this episode was particularly uncomfortable for the ACRG:

- ☐ inconsistencies were acknowledged in the criteria applied and procedures adopted in relation to different submissions – 'we are applying conditions to them which we did not apply to others' and 'we are being rougher':

  'JMB should not be judged by its past, and what were perceived as weaknesses in previous experience. In other cases where applicants were newly created agencies, with little track-record, approval had been given on a basis of trust – that the AVA would develop in accordance with ACRG's expectations' (ACRG, January 1991)

- ☐ relationships between the working party which considered this submission and the ACRG were shown to be brittle: the working party 'acted in good faith' but 'we have acted behind and around the working party'
- ☐ dealings and decisions by the ACRG were subject to challenge and change: members were not disposed to accept a proposal but were 'minded to approve' following correspondence with selected members and on a formal vote (the first and only occasion where voting was found to be necessary)
- ☐ judgements were viewed as 'political' as much as 'educational' – 'members should have regard to the likely implications for the position of other prestigious bodies, whose involvement with and confidence in ACRG's framework were to be encouraged' and 'we would be very unwise to reject this submission':

  'There was a wide gap to be bridged, and ACRG had set its mind to finding a compromise. JMB was expected to demonstrate more fully its empathy with ACRG's principles, values and criteria, to show movement from its old gatekeeper role to the spirit of what was written down in the proposals. As an AVA, JMB would need to fulfill a new role as facilitator, not just the job of regulator. ACRG's expectations should not be unreasonable, however' (ACRG, March 1991).

More fundamentally, the difficulties encountered in admitting a matriculation body into the approved circle of AVAs were to highlight the anomalous position of the framework at a significant moment in the history of further and higher education. On the one hand the initiative was intended to reach those parts of higher education least aware of or most oblivious to alternative forms of entry – an exercise in legitimation directed at institutions, departments and individuals identified with an élite system. On the other, it was expected to

connect with currents and developments at the cutting edge of a post-binary system – a context and climate of change which was not anticipated (even less imagined) at the inception of the scheme.

Notes

1. See, for example, the recommendations regarding access courses, entry procedures, and mature and unqualified students in chapter twelve of the *Report of the Committee of Enquiry into Academic Validation of Degree Courses in Public Section Higher Education* (DES, 1985). The publication of this report was significant in the formation of the Forum for Access Studies as a national body to represent and promote Access Studies into higher education.

2. See Lewis (1989) for a perspective on Access Courses from the CNAA which builds on this speech.

3.The DES letter of invitation of 1978 was part of a policy 'to ensure that all members of the community have equal opportunities to develop their aptitudes and abilities to the full' and it envisaged that 'special preparatory courses' should be designed 'to cater particularly, but not necessarily exclusively, for suitable members of the ethnic minority communities' (DES, 1978). The initiative was evaluated by Millins (1984) and the progress and performance of students from selected Access Courses were the subject of a follow-up study by Yates and Davies (1987).

4. 'Perhaps unexpectedly, the returns show that two-thirds of courses have a single outlet to a specific HE institution. This confirms impressions that the majority of students prefer to undertake their degree and diploma studies locally. The categories of specific links (87%) are far more widely practised than that of open outlet (13%). Students from the latter category, however, may go to a wide range of institutions, both regionally and nationally' (CNAA, 1990: para 30).

5. Extensive use is made in this and subsequent sections on quoted material drawn from interviews with participants or observation of meetings. Individuals are not identified, although the category of participants represented is normally indicated. Such material is to be distinguished from quotation from written sources which are referenced in full throughout the report.

6. The DES had undertaken a review of the CNAA in 1990 (DES, 1990) and had recommended that the funding of the ACRG (one of two activities, the other being CATS, described as 'special tasks') should in future fall within the scope of a re-constituted CNAA.

7. For an historical account of CNAA machineries, relationships and procedures, especially partnership in validation, see Silver (1990).

three

Implementation at Regional and Local Level: The Authorised Validating Agencies

Evaluation of the introduction and early impact of the framework at the level of institutions and courses was the primary focus in the later part of the study between September 1990 and August 1991. The structures and processes described in this section only relate to the situation during this period and should be set in the context of larger as well as more recent developments at national level outlined in the previous section. Research in the later period was conducted mainly through detailed case studies of five AVAs, each designated in the first round of approvals but selected to reflect different histories, structures and circumstances:

Access to Learning for Adults (ALFA), one of four 'open college' AVAs in inner London to be approved in the first round, new to accreditation and validation but experienced in networking and collaborative working

Birmingham Access Federation (BAF), a 'consortium' AVA established by the local education authority to plan and develop new courses as well as to recognise existing programmes

Manchester Open College Federation (MOCF), an 'open college' AVA with considerable and early experience of accreditation of a wide range of learning activities in Greater Manchester and further afield

Newcastle Polytechnic and Partners (Newcastle), a 'single institution'

AVA approved initially to conduct validation only in relation to the modular foundation programme offered by the polytechnic in association with local colleges

South West Access Validating Agency (SWAVA), a 'consortium' AVA set up originally as a monitoring group and serving a large and mainly rural region.

Rather than attempt to trace the impact of the framework on a case by case basis, the findings derived from fieldwork and other interaction with these and other AVAs have been presented more thematically. This is intended to highlight the variety of ways in which the intentions of the central body were interpreted, managed and implemented on the ground. The five case studies capture only part of this diversity, although reference is also made to AVAs which were contacted on a less regular basis and with a view to extending the range of coverage. At the same time, the dynamic environment in which AVAs developed and operated has made for further complexity and more fluidity. With this in mind and because the five case study AVAs are the main source of reference in this discussion, an outline description of key characteristics and contexts for each case study AVA is provided in Appendix III.

As in the initial phase of the study, three main sources of data are combined:

- ☐ that obtained from an analysis of AVA documents and course submissions
- ☐ that based on observation of management committees, validation panels and staff development events
- ☐ that drawn from interviews with staff from institutions and organisations in membership or relationship with AVAs.

These sources and methods along with the involvement of other AVAs are reported in Appendix I.

3.1 REMIT, STRUCTURE AND RESOURCING OF AVAS

The remit of AVAs, as noted earlier in this report, has ranged widely, being rooted in their historical development and reflected in their structure and resourcing. Some had a narrow remit related solely to the validation and review of Access programmes; some included a wide range of other activities, representing sometimes the larger part

of their work; some occupied a position between these two. Frequently the range of activities was related to the age and stage of development of the AVA: the newly established networks tending to a narrower focus and those in existence for longer having added other activities as they became more established (or in some cases having added validation and accreditation to their existing operations).

The structure and resourcing of AVAs was in turn closely related to such features as the philosophy and style of working of the agency, the character of the organisations and relationships within the AVA, the size of the agency in terms of the number of institutions and courses involved, and the social and economic geography of the locality or region.

Activities and services

The range of activities encompassed by AVAs was equally diverse. The open college AVAs in particular were centrally involved in the accreditation of students and courses at levels other than just access to higher education and in settings which included community organisations, prisons, industry and commerce, social services and voluntary organisations as well as adult and further education. They also offered a range of other services – staff training, curriculum development, networking, marketing, information services, advice and guidance, consultancy, investigative studies and development projects – alongside the work of kitemarking access to higher education programmes. Other AVAs were involved in a much narrower range of activities linked directly and straightforwardly to the validation of Access Courses.

The remit of AVAs varied also in the way it was expressed – some had explicit aims and objectives, some stated functions, some put more emphasis on a style of working. In general, those with long lists of aims and objectives had much left to achieve, whereas those with simpler or shorter lists could point to activity in most if not all areas. Most had spent their first year as an AVA setting up new procedures or reviewing and revising previous arrangements, which had left little time for the achievement of other goals. In the case study AVAs in particular it was the provision of staff development which seemed to have suffered most: 'there just hasn't been enough time'.

Those AVAs which intended to act as 'planning' bodies in relation to their locality or region found they had little or no power to operate in a strategic way. Those who saw themselves as promoting the development of new courses found that there had been growth anyway, enough to keep them busy. However, these same AVAs had not always been sure that such growth was necessarily in the right

areas – 'is it fair on the students to validate more humanities courses when we know their chances of getting into an English Literature course around here are pretty slim'; or that it was orderly – 'are the right number of courses, the right number of places in the right subjects in the right locations'; or that it was necessary – 'we may be getting to the point where we have met all the residual needs'; or that it was manageable – 'I think we already have as many courses as the local HE institutions can absorb'. Others assumed that 'the colleges have done their homework and know their markets'. In areas where the AVA and much of the provision had been of more recent origin such questions were of less significance.

Structures and changes

Structures varied from the very simple to the relatively complex. In several of the case study AVAs the growth in the number of courses and students or a change in the level of resources available to them was to reach a critical point during this phase of the study. In two examples these pressures produced significant changes in structure and organisation: in ALFA, this meant a referral back to the ACRG for approval of a new and larger AVA structure – the London Open College Federation (LOCF) – which would incorporate ALFA and the three other AVAs in inner London; in Newcastle, a major re-structuring was under discussion within the AVA which would be presented to the ACRG in due course.

Some AVAs had modified their structure to respond to perceived weaknesses. For example, the uncomplicated structure of SWAVA, while benefiting from clarity of purpose and simplicity in organisation, was unable to extend or deepen the involvement of member institutions and access practitioners. As a result, an annual conference was established to widen the sense of ownership of the organisation and to engage more directly with curriculum matters.

Those AVAs which had a very wide remit, the open college AVAs in particular, had developed more complex structures which reflected their span and scale of activity. However, they had responded to the adoption of AVA status and responsibilities in different ways: MOCF had embedded the AVA role in the wider open college framework, endeavouring to avoid separating it out as a different or special activity; ALFA had seen the validation of Access programmes and the procedures for kitemarking as different from the accreditation of learning activities at other levels and had different committees responsible for this work. The corresponding structures were therefore quite different. The idea of fitness for purpose, a notion commonly identified with development of Access Courses, was applicable also to the

structures of AVAs, being fluid rather than fixed, and attempting to respond to the needs and aspirations of members on the one hand and to the constraints of limited resources on the other.

Membership and representation

The concept of membership of an AVA was not always defined explicitly. It was often not clear, for example, whether membership of an AVA was automatic for those institutions which had courses validated by the AVA, whether membership of the main committees was synonymous with membership of the AVA, or what rights and obligations were involved in institutional membership. This was particularly the case where there was no membership fee or formal resource commitment associated with membership. A consequence of this ambiguity was often a lack of clarity, in operational terms, about ownership of AVA practices and procedures.

Some AVAs, particularly those with open college structures, used the concept of membership to embrace organisations not directly involved in providing courses or receiving students, such as trades unions, community groups, voluntary organisations, and advice and guidance services. Other AVAs had only providing and receiving institutions as members.

As noted at other points in this report, the ACRG had not concerned itself directly with the issue of equal opportunities in relation to the structures and practices of AVAs. It was, however, a central concern in many AVAs, although usually more important for some members than others. Women and members from minority ethnic groups were under-represented on committees in a number of AVAs. Part of the problem for AVAs was that representatives were normally nominated by the institutions – the AVA could only 'suggest': 'we remind them of equal opportunities policies but we can't tell them who to nominate'. The Black Country Access Federation (BCAF) had been particularly active in raising this issue through the SCAVA, and the working party established by the SCAVA to develop criteria for periodic review included this in their recommendations to the ACRG.

The role of representatives on AVA committees was seldom made explicit. It was commonly assumed that an individual would represent their institution to the AVA or the AVA to the institution or both, as well as contribute in a way appropriate to their personal skills, knowledge and experience. In many AVAs it was also assumed that the higher education representatives would be able to 'deliver' their institutions in some way. This usually meant converting unsympathetic admissions tutors and negotiating new or stronger progresssion links for students, as well as identifying appropriate members for

validation panels. Institutional representatives were expected to achieve these tasks either through their formal position in the management hierarchy or through informal and personal networks. However, for some this was a slow process; such expectations were not always able to be met in the short term and this had caused some tensions.

Where the AVA had a tiered committee structure, the tiers were often related to representation at different institutional levels. In ALFA, for example, heads of colleges were nominated to the management committee, heads of departments or cross-college co-ordinators to the validation committee, and lecturers invited to sit on validation panels. In Newcastle, the structure had been built on the principle of maximising the involvement of practitioners in further and higher education and senior managers from the colleges were not formally represented. This presented a problem when there was a need to review and revise the funding base as there existed no forum for the discussion of financial contributions from member institutions. This difficulty was resolved relatively easily by calling a special meeting of the heads of participating institutions, but the episode highlighted the need for involvement at that level. Conversely, in SWAVA, difficulties in achieving effective communication and a sense of ownership were seen as resulting from the relatively limited involvement of practitioners in the work of the AVA.

Many of the AVAs in the metropolitan and major urban areas had invited representatives from neighbouring AVAs to sit on their main committee in order to improve links, increase understanding and share experience. Typically in these environments, there was considerable crossover of students between institutions in different AVAs and reciprocal representation was seen as a means of avoiding multiple membership of different AVAs by some institutions. For SWAVA, operating in a very different context – geographically relatively discrete and distanced from other AVAs and where all the higher education institutions in the area were members – such issues did not arise. Other AVAs, such as the Southern Access Federation (SAFE), had invited individuals from further afield to participate as 'externals' and to benefit from 'outsider' perspectives.

Resources and fees

The level and type of resources available to AVAs were very different and it was the scale of support from local education authorities which was most significant. Such support might be in cash, as in the case of open colleges, or in kind, as in the example of the Hertfordshire Access Consortium, where the local education authority provided the leader-

ship and administrative support for the AVA through its advisory service. During this phase of the study, many AVAs in receipt of cash support had to come to terms with reduced budgets, and there was a general shift from direct budgetary support from the local authority towards indirect support through fees charged to the providing institutions, though at present often underwritten in some way by the local authority. In Birmingham, however, the local education authority had increased its direct funding of BAF for 1991–92. Other local authorities had supported their AVAs through funding secondments or part-secondments of further education staff to the AVA.

In AVAs with no local authority support, the resources were often provided by an institution of higher education, usually in kind through the provision of administrative support and frequently through a high level of involvement by the access co-ordinator for the institution. Most colleges of further education provided some remission of teaching time for staff to act as access co-ordinators and this usually required them to represent the college in some formal capacity. Even within one AVA, however, there was often a great deal of variation in the amount of remission awarded and many college co-ordinators had complained that they found it insufficient to cover both their institutional roles and their AVA responsibilities, particularly in areas where there had been a large increase in the number of students or courses or both.

The level of fees charged for membership, validation, moderation or staff development varied according to whether the AVA was expected to be self-financing (and with no hidden subsidy) or, at the other end of the spectrum, whether it operated almost as a 'cashless society' in which the resourcing was based on a system of mutual exchange of services in kind. Most AVAs were somewhere between these two, although there was a general movement towards the self-financing model as local authorities delegated budgetary authority to colleges, reorganised their services accordingly and prepared for the changes proposed in the White Papers published in May 1991. The pressure on institutions of higher education, especially the polytechnics, to use buildings and staff more efficiently also meant in some cases that hidden subsidies were made more visible and subject to closer scrutiny. Most nevertheless had been able to sustain their subsidy at a similar level although often within more clearly defined limits, but others had begun to charge the AVA a rent for the accommodation it occupied, for example. The universities on the other hand seemed to have been able to manage the hidden subsidy more easily, possibly because this was in many cases at a lower level of support

than that provided by the polytechnics, or because this involved staff time rather than physical resources.

The other factor determining the level of fees charged by the AVA was the extent of the services provided, in particular the level of support for course development, for the preparation of documentation for validation, for moderation and external examining. For example, the support for preparation of course documents might be as little as a short meeting between the course tutor and the secretary of the AVA or it might be as much as two development officers each devoting two half-days for work with the whole course team. In general, those AVAs which employed development officers were able to offer a greater amount of support than those without and this was reflected in the level of the fees which were charged in each case.

Some AVAs (for example, Bristol Polytechnic and Partners) charged only a membership fee and this was usually significantly more for institutions of higher education than for colleges of further education. Other AVAs charged fees for validation only (for example SWAVA), for validation and moderation (most open college AVAs) or for moderation only (Newcastle); some charged for membership and for validation and moderation (for example, North and East London Access Federation); and some had no cash fee (BAF, Hertfordshire Access Consortium).

In Newcastle, the students had for several years paid a moderation fee as a contribution (estimated at 50 per cent) of the cost of moderation. This was an arrangement in place before AVA status was granted and did not reflect a charge arising from kitemarking. Elsewhere, the argument had been put that the recommendation from the ACRG – that students should not be asked to contribute to the costs of kitemarking and certification – was inappropriate and inconsistent: all other recognised qualifications required some kind of registration or examination fee and colleges could always remit or exempt students on the basis of their financial circumstances.

The complexity of the resource lines, the fee structures and the levels of services provided by AVAs must caution against any simple comparison of costs to the providers of Access programmes. Indeed, there was a suggestion that differences in charges would lead providers to 'shop around' for the cheapest AVA. The present study found no evidence of this pattern of behaviour. Some courses had sought validation outside their local AVA but this was usually related to progression routes for students and links with particular courses or institutions of higher education located in a neighbouring AVA.

3.2 ROLES AND RELATIONSHIPS

3.2.1 Role of local education authorities

Attention has already been drawn to the role of local education authorities in providing the main source of funding for many AVAs. Where support was offered in kind rather than cash this might take the form of staff and services – professional and administrative in addition to clerical – as well as space and equipment. In the case of the Hertfordshire Access Consortium, the advisory service provided the chair and the secretariat for the AVA together with the necessary clerical support. In addition, the local authority provided a funding framework to enable staff in colleges of further education to act as moderators, panel members and co-ordinators in a county-wide system of mutual exchange. In the Northamptonshire Access Consortium, the local authority inspectorate participated in the main AVA committees, provided the framework for external moderation and examining, organised curriculum development through various cross-county groups, and supported access-related staff development.

There were also examples where a number of local education authorities had combined and collaborated to establish an AVA. In the West and North Yorkshire Access Validation Consortium, a federation with five local authorities in membership, local authority support had taken the form of payment of the membership fees for all the colleges of further education in the scheme in the first year of operation. The experience of working with more than one local education authority was rather different in London where the abolition of the Inner London Education Authority required the London Open College Federation to negotiate separate funding arrangements with newly created education authorities in the inner London boroughs. In some areas, on the other hand, the role of the local authority in the AVA was virtually non-existent, although it might have been very supportive of the development of Access provision in the colleges.

Clearly, it was in those AVAs where the local education authority was in the forefront of development that the future looked most uncertain during the study. Some of the open college AVAs had already been given deadlines to become financially self-sufficient and this uncertainty was to be increased yet further with the announcement that colleges of further education were proposed to be removed from the control of local authorities.

3.2.2 Role of development officers and chairs

A number of agencies, including all the open college AVAs, had a

development officer to co-ordinate and conduct much of the work of the organisation and to service its committees. The open college AVAs in the large metropolitan areas often had more than one development officer fulfilling these functions. The post was less common in other AVAs and was titled in different ways: BAF, for example, had an 'executive secretary' and in ALFA the position was described as a 'co-ordinator'. The term development officer will be used here to embrace all of these. Sometimes the development officers were seconded (usually from colleges of further education) and sometimes they were regular posts. In the open college AVAs much of the work of validation – chairing panels, preparation of panel reports and checking that conditions had been met – and of receiving and scrutinising moderation reports was undertaken by them acting with delegated authority from the relevant committees. In some agencies, for example ALFA, less was delegated in the first year of operation and the relevant committee, particularly the Access Validation Committee (AVC), retained more direct control in order to identify the issues arising and judge the scale and scope of the activity; it was in a sense a 'pilot' year. The development officers also represented the AVA on various bodies, locally and nationally, as well as developing and servicing practitioner networks and overseeing research and development projects.

The presence of a development officer brought many strengths to the AVA but there were also potential dangers, and the extent to which they were realised in practice depended to a large degree on the management skills of those involved. On the one hand:

- ☐ it provided continuity and a focus for development and information into and out from the AVA
- ☐ it was a point of contact for local practitioners and members of the network
- ☐ it provided time for reflection, review and keeping up to date with local and national developments
- ☐ it provided an effective communication and consultation system with members
- ☐ it avoided over-dependence on goodwill
- ☐ it provided a professional rather than a 'spare time' service
- ☐ it provided a mechanism for consistency on validation panels
- ☐ it clearly located responsibility within the AVA.

On the other:

- ☐ it might hinder rather than promote direct links and relationships between further education and higher education institutions

- ☐ it might lead to overload and drift as officers were asked by committees to undertake more and a wider range of activities
- ☐ it might lead members of committees to become more out of touch with the work of the agency
- ☐ it might mean an increase in paperwork and bureaucracy
- ☐ it might be an expensive commitment for an AVA with limited resources.

In some AVAs there was no development officer and other ways were found to cover these duties. In Newcastle, most of the work of servicing committees, co-ordinating the work of the agency and issuing certificates to students was done by the access co-ordinator for the polytechnic. In SWAVA, the secretary and chair of the AVA were the access co-ordinators in the polytechnic and the university respectively. Much of the administration and servicing of the committee and validation panels was carried out by the secretary as part of his polytechnic post. However, other members of the committee were also closely involved in the routine work of the AVA and undertook tasks in rotation or according to their particular expertise, such as drafting guidelines, chairing panels, hosting meetings, organising staff development events, and responding to the ACRG on particular issues. This way of working was in part a matter of principle – light of touch, simple, unbureaucratic, economic – and of practicality, since the resource base was very small. Again, there were obvious advantages as well as some potential weaknesses in this type of arrangement:

- ☐ it generated a sense of ownership, involvement and teamwork among members of the committee
- ☐ it placed a heavy burden on key members, especially the secretary
- ☐ it kept cash costs down
- ☐ it put the onus on individuals rather than institutions
- ☐ it made communication with the wider network more difficult
- ☐ it limited the scale and range of activities
- ☐ it meant that the higher education institutions bore the main costs.

Some of these were potential rather than necessary outcomes of the model and some might be both strengths and weaknesses. For example, limiting the range of activities might mean excluding important issues and developments or it might mean a sharper and clearer focus on priorities and on what was manageable and achievable. In fact there seemed to be a critical mass below which this model could be very effective. However, above that point the limits on further and future development were more exposed. Leadership and co-ordination of curriculum development and innovation, for example, was not possible when the volume of work outstripped the

capacity of members to manage it within their current roles and responsibilities. Both SWAVA and Newcastle were rapidly approaching this critical mass by the middle of 1991 and both were seeking ways to finance at least part of a designated post to support administration and development.

In all types of AVA, the role of the chair – both of the AVA as a whole and of the various committees and panels – was crucial. If meetings were conducted in a very business-like fashion a large amount of ground might be covered but, unless there were other effective forums for debate and consultation, members might feel excluded and have no sense of ownership of the decisions and the activity in general. If too much debate was encouraged, meetings lost direction, ran late and members lost sight of the decisions which were taken. Again, if any one or small group of interests was allowed to dominate the proceedings, participation and attendance tended to decline. If, for example, checklists of criteria for validation panels were not properly and fully addressed then the quality assurance procedures might be undermined. All these tensions were to be observed in the various meetings of AVAs but in most cases senior and experienced staff had been appointed as chair to key committees to provide for effective decision-making at this level.

3.2.3 *Participation and partnership*

The quality and style of the collaboration within AVAs varied, particularly between further and higher education, and was dependent on the history of the development of the AVA and the local political context. Although involvement with an AVA was only a small part of the activity of member institutions, it had been seen by most as a significant one. Representatives had given it serious attention and commitment. This has meant that tensions and rivalries between members institutions were usually able to be managed and accommodated within the AVA.

In some AVAs, there was a history of collaboration between institutions and individuals in networks which had developed from the 'bottom up'. In the two open college AVAs investigated in the study, for example, great emphasis was placed on the need to achieve consensus within and between participants in the scheme; and in MOCF in particular the creation of a democratic culture was an explicit goal. Like the other AVAs in inner London, ALFA was able to build on a strong pattern of collaboration between institutions of further and higher education fostered by a common model of linked Access provision. However, in both cases these relationships were disrupted at the formal level during this period. In Manchester, the

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merging and reorganisation of much of further and adult education meant that representation on committees had to be reviewed and renewed. In London, the abolition of the Inner London Education Authority led to major re-structuring in post-school education and in the careers and guidance services, which produced similar difficulties and discontinuities in terms of involvement in the AVA.

In the other three case study AVAs, the influence of higher education was stronger, although for very different historical reasons. In Newcastle, the modular foundation programme offered since 1981 had remained certificated by the polytechnic and not surprisingly that institution had retained its lead role in the administration of the scheme and in the determination of academic standards. Nevertheless, curriculum development was conducted jointly and co-operatively between teaching staff in the colleges of further education and the polytechnic, and within the AVA there had been a strong input from the colleges. Interestingly, attempts by the polytechnic to share with the colleges the responsibility for administration and wider development were met with some resistance on the grounds of resources.

In SWAVA, the situation was complicated by the fact that the institutions of higher education were themselves major providers of Access Courses and were among the first to develop this kind of provision in the region. This was reflected in the membership of the main committee of the AVA where the proportion of further to higher education representatives was 4:10 but that of providers to receivers was 8:6. The geography of the region was also a contributory factor as more time was necessary for participation in panels and meetings given the considerable distances to be travelled between institutions. This, together with the greater teaching commitments of further education staff tended to make it more difficult for them to participate as fully. Positive steps were being taken to address the issue, and the role of further education within the AVA was likely to be enhanced by the appointment of both the next chair and the next secretary from that sector.

In BAF, the Joint Matriculation Board had been very influential in the way in which procedures and criteria were developed. Prior to the establishment of the national framework, all courses approved by BAF were automatically recognised by the JMB and despite the formal balance of numbers between further education and higher education, the latter remained a powerful influence. This related in part to the fact that the higher education representatives were generally older, more senior and had been involved with the consortium since its inception. The further education representatives had not been able to

achieve the same continuity – postholders had changed and they experienced more difficulties in attending all the meetings. Again, steps were being taken by the AVA to minimise these problems in future years.

In the case study AVAs, there was a considerable history of local partnerships in the design, delivery and assessment of Access programmes and strong links for the progression of students. In the main these were not seen to be significantly affected by the appearance of the AVA, although there were some concerns that the national framework might undermine the strength of guaranteed place arrangements. In the majority of these cases there were collaborative arrangements already in place for the approval of courses and these had become more formalised and sometimes strengthened by the arrival of the AVA. The extent to which real parity has been achieved or enhanced in these relationships was dependent on the commitment, skill and experience of those involved as well as on the market for students and the positioning of institutions.

Agencies which were new networks and created primarily in response to the establishment of the national framework provided staff in colleges of further education with more opportunity than existed previously to secure greater and closer involvement in formal collaborative arrangements, especially where an AVA brought together institutions of higher education across the binary line. At the same time, and serving perhaps to limit the extent of this involvement, there had been a tendency for one or more institutions of higher education to take the lead in the formation of an AVA and to provide an administrative base for its early operations. This was more likely to be the case where single institution AVAs had been established and where the involvement of the local education authority was minimal.

Towards the end of this part of the study, there was some evidence of convergence within these different patterns. In well-established networks, a rapid expansion in the number of Access Courses or students (or both) together with the adoption by institutions of higher education of broader operational definitions of access and accessibility (taking in, for example, modularisation, credit-based learning and franchising) had put pressure on AVAs to redistribute some of the workload to other parts of the AVA and to increase their fees to member institutions in order to employ the services of development workers. Furthermore, as the operation of AVAs had 'settled down' there had been examples of serious attempts to share power and allocate responsibility more widely. As one representative from higher education put it: 'it was necessary for us to be at the front in the beginning because like it or not that was the way to gain credibility

– but now that's established I think we should be standing back more and concentrating on making our own institutions much more accessible in a wider sense than just being willing to take students from Access Courses'.

3.2.4 National and regional networks

The historical, geographical and political conditions which shaped relationships within AVAs were also likely to be manifest in relationships between AVAs, with different degrees of association apparent in different parts of the country. However, a more recent set of developments had begun to influence AVA patterns and operations during this period. First, the coming together of AVAs at national level – through what was to become the Standing Conference of Authorised Validating Agencies – to share experience and represent the interests of AVAs to the ACRG. And second, the participation of the open college AVAs – through the National Open College Network (NOCN) – in an agreement covering mutual recognition of credits.

The NOCN represented an important forum for discussion and development concerning AVA matters, partly because all open college networks in full membership of NOCN were AVAs and partly because some non-open college AVAs were considering moving in this direction. One of the case study AVAs – BAF – had recently been granted associate member status within the NOCN and had begun to develop structures and procedures to pilot the accreditation of courses in adult education at open college levels one and two. As part of that development, BAF worked closely with two other neighbouring AVAs, one of which was a well-established open college and a full member of NOCN and the other also an associate member. Apart from the greater regional collaboration of this kind, there had also been a 'liaison meeting' at national level between representatives of the NOCN and the ACRG where a number of issues, including arrangements for kitemarking, had been identified for further exploration.

At the time of the fieldwork, the other two AVAs – Newcastle and SWAVA – had not sought themselves to become open colleges but they and their member institutions had been involved in discussions over a considerable period of time about the possibility of establishing an open college in their own region. During the summer of 1991, resources and some staffing were made available in both regions to begin development work and the AVA was represented on the steering group for the scheme in each case. As in the example of BAF, the intention was to begin with accreditation of programmes at open college levels one and two and then look to extension of the arrangements to those levels equivalent to access to higher education

In Wales, the Welsh Office and the University of Wales had funded a Welsh Access Unit to co-ordinate and support the development of Access provision.[1] This had involved the establishment of the three AVAs in the principality, the organisation of access-led staff and curriculum development, and the conduct of several associated research and development projects. It had also promoted the sharing of ideas and experience as well as strengthening collaboration between the three AVAs, although each had developed in its own way.

Regional networks were often complex, with AVAs involved in a variety of relationships with non-member institutions and other AVAs. In the north-east of England, for example, there was in the early period if the framework only one AVA in the region – Newcastle Polytechnic and Partners – and only one institution of higher education (Newcastle Polytechnic) was in membership. This had not prevented the University of Newcastle participating in a guaranteed place arrangement developed through the AVA, and access co-ordinators from higher education institutions across the region continued to meet independently of the AVA. Standing invitations to key meetings of the AVA were extended to other establishments of higher education in the region; some attended regularly, others did not. In 1991 the Tees-Wear Access Federation was established as an AVA, involving collaboration between the two other polytechnics in the north-east (Sunderland and Teesside) and including later the University of Durham in membership. Several colleges offered Access programmes which had already been validated by institutions of higher education in both AVAs but this was not seen to present any difficulties.

Between other AVAs there were tensions and suspicions at some levels and co-operation at others. In the north-west, for example, there were close working relationships between MOCF and Merseyside Open College Federation, but formal relationships between MOCF and Cheshire AVA were more strained, even though contacts at practitioner level were often cordial and co-operative.

In many metropolitan areas there was a complicated pattern of overlapping relationships. In the West Midlands, for example, all the colleges in the City of Birmingham were members of BAF, which validated most of the provision, but colleges also had some courses validated by other AVAs (such as the Black Country Access Federation and the AVA linking Coventry Polytechnic, the University of Warwick and the Federation for Access to Midlands Education). These usually related to well-established progression routes and, again, did not seem to pose any problems; indeed, they provided crossover links between the AVAs. More unusual was the position of Birmingham

Polytechnic, a member of BAF but also an AVA in its own right, with authority to validate courses outside the city. At the time of the fieldwork, this agency had not formally accepted the offer of AVA status and had not undertaken validation of Access Courses for the purpose of kitemarking. Instead, it had encouraged course providers to seek validation through the BAF consortium.

In other areas, there was little contact with neighbouring AVAs and the national network created by the establishment of the SCAVA was seen as the most useful forum for the exchange of information and ideas. In the south-west of England, for example, SWAVA was 'out on a limb' geographically and had no near neighbour AVA with which it either competed or shared common interests. There had been some discussion about inviting the closest AVA to participate in validation panels but the general consensus was that the SWAVA had most to offer (and most to gain) from its present reach and active participation in the SCAVA rather than any artificial regional grouping.

The first year of operation of AVAs was generally a settling-down period in which old relationships had been reviewed, reinforced or allowed to lapse, and new relationships were only just beginning to emerge. Newly approved AVAs had usually concentrated on setting up their own systems and procedures before working on their relationships with others. Some looked to the ACRG to provide a framework of rules or guidelines in which emergent difficulties might be resolved; others looked to the SCAVA for mutual support and wider networking.

3.3 QUALITY ASSURANCE MECHANISMS

There were three key aspects to the quality assurance mechanisms in AVAs: the review and evaluation of AVA procedures; the validation and periodic review of courses; and the moderation and annual review of programmes.

3.3.1 Review and evaluation of AVA procedures

All the five case study AVAs had some form of review built into their procedures, often related to the annual granting of resources but also as part of the process of accountability to members. As noted before, those which were recently established or new to the conduct of validation (for example, ALFA and SWAVA) tended to be very self-conscious about decision-making during the first year. Members were aware that almost every decision was creating a precedent or 'case

law' and that there needed to be careful consideration of the implications of any decision as well as constant checking against agreed procedures and terms of reference. Those case study AVAs which had been established longer had each undertaken a major review, although for different reasons in each case: in one because the scale of activity had outgrown the capacity of the present structure and resource base (Newcastle); in another because there had been major restructuring in the local education authority, changes to the resource base, and a national credit accumulation agreement involving major changes to course structures and student records (MOCF); in another because a new development officer had been appointed (BAF).

The evaluation was conducted in a variety of ways both formal and informal using a wide range of sources and means:

- ☐ special review meetings of key committees
- ☐ evaluation reports from course tutors on moderation and validation processes
- ☐ evaluation reports from validation panels
- ☐ annual reports on progress towards aims and objectives
- ☐ reports to the academic boards of member institutions
- ☐ reviews of documents, terms of reference, guidelines, checklists and standing orders
- ☐ reviews of record keeping systems
- ☐ reports on the implementation of criteria for validation and for the appointment of moderators
- ☐ financial reports, budget forecasts and development plans
- ☐ reports of issues arising from staff development events and practitioner forums
- ☐ informal and *ad hoc* feedback from local practitioners, providing colleges and receiving institutions
- ☐ feedback from regional and national networks.

Some of the review processes were integrated into routine practice, whereas others were special or annual events. The development officer(s), chair and secretary were key participants in the evaluation process and in the implementation of modifications and amendments identified as necessary. Changes to their own practice and in relation to the formal procedures of committeess had been put into place more quickly than more system-wide adjustments, such as those affecting external moderation and external examining across the AVA. Most AVAs were aware of their strengths and weaknesses and were endeavouring to address them; one AVA summed up the first year of operation as 'not there yet but trying hard'.

All the case study AVAs had self-evaluation built into their prac-

tices and procedures in various ways but each had also found it useful to have input to that process from the preliminary findings of the evaluation study which were made available to individual agencies.

3.3.2 Validation and periodic review of courses

Practices and procedures

Most AVAs delegated the approval of courses to panels. These were variously called validation panels, accreditation panels and recognition panels. The one exception among the case study AVAs was Newcastle, where some 20 modules were offered across nine institutions. In this scheme new modules were developed by groups of tutors in consultation with a member of staff at Newcastle Polytechnic and submitted to the main committee of the AVA for approval.

Preparation for a panel

Most AVAs had guidelines about the kind of documentation to be prepared for a panel. The issues to be addressed were usually indicated as a series of headings and questions; these did not prescribe the content but invited the proposers to present a rationale and justification for the programme and its constituent parts. Frequently, as experience had developed, the guidelines were modified to take account of omissions or to serve as a means of disseminating good practice.

In advance of a meeting of a validation panel, a member of the validation committee (usually the secretary or co-ordinator) or a development officer acting on delegated authority, would advise on the drafting of a validation document. If at this stage a proposal was viewed as being unlikely to be approved, the course team were advised to defer or delay their application.

The amount of advice and support offered to course providers tended to be highest in open college AVAs, given their purpose to accredit – and not just validate – programmes of learning submitted for recognition. This was most conspicuous and intensive where colleges were not familiar with the philosophy and practice of credit-based learning. In other AVAs the level of support might consist of one meeting to talk through the guidelines or to comment on a draft submission, supplemented where necessary with advice given over the telephone. Where there was already an approved programme in the institution, staff were encouraged to consult with colleagues. In some colleges (for example, in the ALFA network) considerable staff development time had been set aside for course teams to prepare their documentation, particularly if it was the first course in the estab-

lishment to go through the system. For later submissions it was expected that a member of that first team (or a college co-ordinator) would assist in the relevant preparation. In a number of AVAs (for example, MOCF) course tutors reported that their colleges gave little or no remission and minimal support for the preparation of the submission.

All the case study AVAs required the course document to be signed by a senior manager of the providing institution as well as by the course tutor. This was to ensure not only that it had institutional support but to signify that the submission had come from the institution rather than the course leader. This document also represented an agreement about how responsibility for quality assurance was distributed between the AVA, the providing institution and the course leader, and might be a useful point of reference if there were problems at a later date.

Membership of panels

Some AVAs did not specify the precise composition of panels in their submission to the ACRG but expressed a principle in broad terms: 'members are drawn from FE and HE institutions and consist of individuals with experience or expertise in the relevant subject areas; independent advisors in the relevant academic areas are also invited to participate'; 'panels must reflect a comprehensive understanding of Access provision and have a reasonable gender balance' (SWAVA).

Others did specify the composition of panels (or were required to do so by the ACRG) in some detail. For example, in ALFA panels consisted of Access practitioners from within the consortium – a maximum of four with no more than two from each of the main sectors, one of whom might be from the providing institution (but not part of the course team), and other independent practitioners with appropriate experience or particular expertise. The latter category had included members of a hospital and nurse training school for a course in health studies, an independent graphic designer for a course in art and design, a member of the local theatre for a course in theatre studies, and independent film makers for a course in film and media studies. The maximum number on a panel was 20; the quorum was six, with at least one representative from further education and one from higher education. Most panels in this AVA had been quite large although none had exceeded the maximum – the size was justified in terms of the need to match the contents and processes of Access curricula, especially where a range of subjects was offered within the programme. Alternatively, panels might be much smaller, as in BAF,

where they consisted of a chair who was a member of the board of studies, the executive secretary, a representative of each of the three institutions of higher education in membership and two representatives from further education who were experienced or acquainted with the field of study.

Some AVAs invited individuals from institutions and organisations outside the AVA, so-called 'externals'. This sometimes related to a possible or agreed progression route for students, sometimes to linked arrangements between AVAs. It was often seen as useful to have an outsider who was not necessarily familiar with the normal practices of the AVA and who might therefore bring a 'fresh eye' or a different perspective. Where courses were designed for women only, the panel was usually all women. When courses were aimed at minority ethnic students, there were usually more panel members drawn from minority communities but, as one member observed, 'there aren't enough ethnic minority lecturers around, unfortunately'.

AVAs had tried to ensure that, in addition to those with substantial experience of Access programmes, there were some with little or no direct experience of these courses. The intention here was to widen understanding of Access programmes and strengthen their credibility. However, for new AVAs and those with large numbers of courses to be validated in the first year, identifying such people and assembling panels on this basis was enormously time-consuming.

Conduct of panels

There were three basic models for the conduct of panels: 'course panels', 'subject panels' and 'programme panels'. In the 'course panel' model what was approved was a more traditionally structured Access Course. This might contain modular elements but typically the curriculum was tightly defined and self-contained, with teaching and learning aligned to particular fields or disciplines. One panel consisting of specialists in all or most of the subjects and skills covered would meet to approve the programme. Sometimes the whole panel would meet to consider general issues, such as target groups, selection procedures, advice and guidance, and course management, then break into smaller groups to consider the subject-specific and skills-based elements. This allowed for detailed scrutiny and participation by the relevant specialists. Generally, the procedure ended with a plenary session to summarise all the comments, conditions and recommendations and to agree a formal recommendation to the validation committee of the AVA. This was the arrangement adopted by ALFA. In SWAVA, the same general arrangement was used but the panel stayed together for the whole session. This model enabled the panel to

undertake a comprehensive examination of the full programme but it did make for a large membership.

In the 'subject panel' model, several courses in the same subject area were considered by a panel of specialists in that field. These courses might be modules from a large multi-disciplinary programme (for example, modules in chemistry or biology) or might represent a whole programme in a narrow range of disciplines (for example, a course in life sciences). This avoided the very large panel which would result if specialists were brought together to consider all the subject areas in a multi-disciplinary programme and was considered an economical use of subject specialist time. It did not, however, promote the range of discussion and debate about, for example, skills development, which was evident where staff were drawn from different backgrounds. This arrangement was frequently used by MOCF and other open college AVAs and was increasingly employed by other AVAs (for example, BAF) for the validation of modules in mathematics. The latter reflected the development of modules in mathematics which were designed for particular purposes – for entry to teacher education, as a core subject in science and engineering, as a skills component in social science – and which were made available through the AVA for use in other courses.

The third type of arrangement – the 'programme panel' – followed from the second. Where modules were approved separately, there was still a need to submit the whole programme for validation and the award of the kitemark. Usually, when panels were brought together for this purpose some but not all of the components would have been approved previously. The task therefore was to approve certain elements separately and to approve the whole programme as a whole, addressing such issues as guidance and counselling and recommended pathways through the programme. The acknowledged difficulty with this model was that the coherence and integration of the curriculum might be difficult to judge and that modules might be examined more than once. In these circumstances it was necessary to have some continuity between the chair or at least some members of the panels involved, and to have available panel reports on those elements already approved. In MOCF where this model was common, there were normally two development officers present at all panels – as chair and as secretary – who provided that continuity.

Most AVAs favoured one type of arrangement but, as more Access Courses adopted modular structures and optional units, this was beginning to change: BAF for example validated mathematics separately in some circumstances and not others so that it used all three models; MOCF tended to use whichever model was most appro-

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poriate depending on the nature of the programme and the range of programmes seeking validation at any one time.

Panels tended to last about three hours for a full Access programme. In some AVAs the panel held a short private session before meeting with the course team or proposers of the programme. The purpose of this pre-meeting was to identify particular concerns and to agree the agenda. It was also common for panels to have a short private session at the end of the meeting to agree their recommendation before conveying it to the proposers. In the open college AVAs this did not happen – the panel and team met together from the outset to agree the objectives and a timetable for the session and to agree the conditions and recommendations at the end. There did not seem to be any real advantage in private meetings as it often meant that items had to be repeated and it increased the sense of 'us and them'. However, some AVAs clearly felt more comfortable with such arrangements.

Panels often took place in the college of the course team (or one of the institutions represented among the proposers). Sometimes an establishment with a central location was chosen, for ease of access and availability of rooms. There were also occasions when the panel visited the providing institution(s) to examine facilities, observe classes and meet with students. Some panels which did not have contact with students nonetheless thought this was desirable and had discussed how this might be achieved; for example, through the inclusion of student(s) on the proposing team.

The composition of the proposing team was important. In one case a single course tutor presented a course to the panel and, although able to answer many of the questions posed, was unable to convince the panel that there had been adequate support in the college for the preparation of documentation and for participation in validation. It had proved to be a very difficult experience for all concerned, especially the course tutor, and the course was referred back so that documents could be written and presented in a more satisfactory way. In another case, a course was presented by the course tutor and two members of the management team in the college. While they were able to say a great deal about institutional support for the course – the resources, quality assurance procedures and management practices in the college – they were not able to answer questions about the content and delivery of some aspects of the programme. As this was a new course it was given approval for two years with comments, suggestions and conditions relating to further information required from the AVA. In another example, key members of the course team were absent and others were not present for the whole session, so that

difficulties arose about the ability or willingness of the team to meet conditions set down in their absence. Most panels were attended by all or most of the course team and, where some members were unavoidably absent, others were briefed to respond to questions. This was frequently viewed by panels as a measure of the way the staff worked as a team and were attentive to the integration of the programme.

Options and outcomes

There were usually four or five possible options available to a panel, ranging from outright approval with no conditions or recommendations to outright rejection. In none of the panels observed during the study were there examples of these two outcomes. The latter was usually avoided by some kind of initial filtering mechanism, usually scrutiny by a development officer or chair of the panel but sometimes by the validation committee itself if an issue of principle or policy was involved. Most courses tended to fall in the middle of the range, requiring some conditions to be met immediately, some longer term and some recommendations to be addressed in the future. Most AVAs were given approval for three (SWAVA) to five (MOCF) years and some AVAs had a shorter option for new courses – one or two years.

Generally speaking, the process of validation did not give rise to major changes in the form and style of Access programmes. The exception was in the London Open College Federation, where all programmes had been recast in terms of open college credits. Most courses were approved with only minor changes. However, some had been referred back for major work and in such cases were required to submit to a new or reconvened panel. One such example reflected serious concerns about the volume and level of work: it was considered too high, too much like A-levels and in some parts it was indistinguishable from first-year undergraduate study. The panel wanted to see the curriculum oriented to the needs and interests of the groups to be targeted and the level of the course adjusted to the exit routes which had been identified. In another, the documentation was poorly presented and did not accurately reflect what the tutor explained as the practice on the course; it too was not clearly articulated with the exit routes which had been described. In another AVA, there were serious concerns about the management of a course and the commitment of senior management to ensure adequate resources and support for part-time staff. Only when a new full-time course tutor had been appointed was the matter fully resolved. In another case, the course team did not agree with the conditions set down by the panel and refused to implement them.

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In the period between validation and review, changes were likely to occur and were expected to be reported to the AVA. Minor changes might require no action at all, others might require the approval of the external examiner or moderator, usually in consultation with the development officer if there was one. It was for the external examiner or moderator, again in consultation with the AVA, to decide at what point minor changes had accumulated into something more major; or whether a particular proposal constituted a major change in itself. In SWAVA what constituted a major change had been defined with some precision: 'normally defined as a change to more than one third of a course or assessment schedule'. Most AVAs had a procedure for adding options to an existing programme by validating them separately but with reference to the total programme. This avoided a full-scale re-validation of the whole scheme.

Course approval was sustained by the AVA receiving satisfactory annual reports from external examiners and moderators and from course tutors. At the time of the fieldwork, most AVAs had only been in operation as franchise holders for one full academic year and therefore there was little in the way of case law relating to actions dealing with unsatisfactory reports. There was an example in one of the open college AVAs which, although it was not part of a kitemarked programme, illustrated how the mechanism might work. A highly critical report from a moderator was received by the AVA indicating that substantial changes had been made to a course without consultation, that liaison between part-time staff was poor, that there was no proper record-keeping, and that meetings were few and far between. The development officer had asked for a response from the providing institution but none was forthcoming, other than a verbal comment that nothing could be done about the problems. The development officer then recommended to the courses recognition committee of the AVA that accreditation be withdrawn until the problems were resolved, and that recommendation was accepted. The course was subsequently revised and was due to be submitted to a new panel. In this case, the main criterion for withdrawal of approval was that the way in which the course was being delivered was substantially different from that which had been approved.

Criteria for programme recognition

Many of the criteria for validation related to curriculum matters – course mode and length, coherence and integration, and assessment – and these are discussed in detail in a later section of this report. In addition to principles of curriculum design and delivery, all AVAs required a clear statement of the objectives of the course; the groups

to be targeted; the intended progression routes for students; the arrangements for advice, guidance, counselling and tutorial support; the procedures for selecting students at entry; the strategies adopted in relation to teaching and learning; the management of the course; the availability of facilities and equipment; and the content of the programme.

In Newcastle, a number of these questions were dealt with when the providing institution was admitted to membership of the programme, rather than as part of the validation procedure. For example, following informal discussions with the AVA, a new institution made a formal application to the main committee of the agency setting out the modules it wished to offer, the management and organisation of the course, the resources available, the nature of student support and the fee structure. Validation of the modules, which were able to be offered by any member institution, was a separate activity and focused on the syllabus content and the overall assessment requirements.

Observation of panel meetings in the case study AVAs (and elsewhere) indicated that all or most of the criteria for validation were considered at great length. Some paid more attention to some issues than others, often reflecting the perceived strengths and weaknesses of the programme and the particular interests of the members of the panel. Some AVAs had checklists available for all panel members, which they found useful, although many panel members had an agenda of their own which they brought to the meeting.

One area that seemed to be under-developed in many course documents was a rationale and description of the teaching and learning methods to be used on the programme. This appeared to have happened for a variety of reasons. In ALFA, for example, where all courses had been re-written based on the open college system of credits, the main focus had been on the criteria and evidence for assessment, something which was new to panel members as well as to course presenters. In MOCF, on the other hand, where the system of credits was well-established and where there was more familiarity with open college ways of working, there was a tendency in submissions for issues of teaching strategy and learning style to be taken for granted. Generally, tutors seemed to find it difficult to describe approaches to teaching and learning in programmes where the member of staff was a resource and a facilitator as much as a teacher. In most panels, however, the issue was able to be examined and overcome by eliciting from the course team examples of the way in which a particular topic or theme might be addressed. The discussion was then reflected in revisions to the course documentation.

Validation criteria were not fixed and static but fluid and dynamic. Particlarly in AVAs which were relatively inexperienced in validation, there were echoes of the experience of the ACRG in adopting an 'evolutionary' approach to the development of framework criteria. As AVAs were presented with programmes which were diverse in nature and structure, their intepretation and application of criteria have had to be refined and modified over time. The concept of adequate guidance and counselling was a common example of this evolution: what counted as adequate has had to be re-examined and debated in the context of large modular programmes compared to more traditional courses. This process of reflection and evaluation had informed the way criteria were to be interpreted and applied in future cases.

The role of the chair of the panel was crucial in managing the time available and the different interests represented, as well as ensuring that all the criteria were addressed. The chair was also the key player in ensuring that flexibility was retained at the same time as consistency and fairness were maintained, and that rigour was balanced with support and development. Clearly, some chairs were more skilled and more experienced than others. Despite the central role of the chair and other panel members in the quality assurance process, the study found no examples of staff development activity in this area. The expectation was that the chair, normally someone familiar with AVA procedures, would be experienced and competent in that role, and that panel members would 'learn on the job' and would be guided by the chair.

Periodic review of programmes

The procedures to be adopted for the periodic review of courses generally replicated those for the original approval of programmes. Very few AVAs had existed for long enough to be starting such reviews; those that had were indeed following the same pattern, although in Newcastle, where there was one large modular scheme, there was an additional task to bring all the modules together in their revised form.

What was not clear, and was not usually made explicit in arrangements for periodic review, was whether the process was one of approving the changes made to a programme since its original approval or whether it was a more fundamental examination with nothing taken as given. The danger was that when a course had been running for some time and was familiar to many people in the AVA, a great deal might be assumed or not challenged; what were once innovations might have become routine practices and accepted as 'the way we do

things'. Again, the skill of the chair and the composition of the panel were important if these issues were to be properly explored. In one example of review in MOCF, the chair made great efforts to bring into discussion many of the routine processes and practices embedded in the course, but it might have been more useful if this had been signalled at an early stage in the review procedure.

Perceived problems and benefits

In AVAs where validation was relatively simple and straightforward, the problems presented for course tutors were minimal. However, so too were the perceived benefits. Where there was more emphasis on validation as a key feature of quality assurance and the validation process was more demanding, there were more difficulties associated with it. These generally related to the amount of time it had taken to prepare the documentation, the overall workload, and the multi-layered nature of the process. The burden was particularly acute when there was little management support through remission or staff development. However, in these cases the perceived benefits were also greater, both in degree and range, with many people identifying more than one positive outcome. These included: 'an opportunity to examine carefully the broader aims and principles as well as content and assessment'; 'thinking educationally'; 'a better course'; 'a stronger course team'; 'contact with other practitioners'; 'greater credibility'; 'greater bargaining power'; 'curriculum development'; 'more explicit objectives and methodology'; 'ownership by staff'; 'learning'; 'staff development'; 'co-operation with other practitioners and new networks'. These kinds of benefits were reported by the panels as well as by the proposing course teams.

In some quarters, the paperwork and procedures required by some AVAs, particularly the open college AVAs or those with similar models, were seen as excessively bureaucratic and onerous. There was certainly a great deal of paperwork and form-filling in some places, and it was not always clear that this was essential as some open college AVAs seemed to have fewer forms than others. However, to a large extent this was a consequence of the scale and scope of the activity, an undertaking which would be difficult to discharge using the more informal procedures of a smaller AVA with a much narrower remit. It was also clear from the study that a majority of practitioners who had experienced these apparently 'heavier' processes felt the benefits were considerable and worth the price. It was noticeable that at the end of a validation panel the course proposers were often exhausted and they described the event as a difficult and demanding encounter.

However, the same people a few weeks later were clear that it had been a valuable experience.

3.3.3 Moderation and annual review

External moderators and external examiners

During the first year of operation the ACRG developed and clarified its views regarding the role of external examiners and external moderators. By the end of 1990, the responsibilities and duties encompassed were clearly seen as two dimensional. The external examiner role was concerned with the scrutiny of the work of students; it was concerned with fairness in the assessment and treatment of students; it was a vertical dimension concerned with outcomes. The external moderator role was a lateral or horizontal dimension concerned with the quality of the learning experience for students, the integration and coherence of the curriculum, and the appraisal and review of the course as a whole; it was concerned with the process rather than the product; and if necessary it involved interceding on behalf of the students. Notwithstanding these distinctions, it was made clear that the roles could be performed by one or more indiyiduals, that such individuals could be drawn from further education or higher education or 'others with relevant and authoritative experience', that externality was important, and that AVAs needed to define their duties and lines of accountability.

The titles had caused some confusion as the terms and descriptions used by the ACRG did not always accord with those adopted in institutions. This confusion emerged particularly during the process of AVA approvals and occasioned some discussion and reference back in a significant number of cases. The titles used by AVAs did not therefore necessarily coincide with the functions attached to them by the ACRG; neither did they accord to a common pattern.

On the ground a variety of models existed, many of which reflected historical arrangements and most of which were in the process of modification, either to meet the terms of the agreement with the ACRG or to improve arrangements in the light of changing circumstances. In some AVAs, for example ALFA, there was a 'moderator' for each course who combined all the functions envisaged by the ACRG. In others, for example BAF and SWAVA, the titles and responsibilities were separated broadly along the lines outlined by the ACRG. In MOCF there were 'course moderators' for each subject area, one of whom was nominated as the 'programme moderator' with responsiblity for the coherence of the whole programme. In Newcastle, 'moderators' performed the functions of external examiners

together with some aspects of moderation as defined by the ACRG; other aspects of moderation, especially issues relating to curriculum integration, guidance and counselling, and course management, were the responsibility of college management.

All AVAs required external examiners and external moderators to have an appreciation of the standards of work to be expected at different stages of an Access programme. However, many AVAs had endeavoured to build into their arrangements some more formal means of comparison between the different programmes they approved. In some this was done fairly simply: ALFA, for example, preferred all moderators to moderate more than one programme and they were expected to attend an annual training event where coursework and assessment practices were compared. Across London it was also proposed to develop a consortium for moderators of similar programmes. In other AVAs, a more complicated model was adopted. In the Northamptonshire Access Consortium there was an external examiner for each subject area who was responsible for that area of work in five courses in the county; similarly the moderator was responsible for moderation across the same five courses. In BAF a similar system was envisaged for external examiners, but with one moderator assigned to each college. In Newcastle the 'moderator' was responsible for the subject module in all the participating colleges, and in MOCF 'course moderators' were generally appointed to several courses in the same subject area and at a similar level. In the Greewich Access Programme, a large modular programme validated by the Greenwich and Lewisham Education for Adults Network, a 'moderator of moderators' was appointed to oversee the scheme.

In most AVAs it was the external examiner and/or the external moderator who sampled the work of students and who approved the marks awarded. In MOCF and some other open college AVAs, however, the aim was to combine courses in similar subject areas in a consortium with a common 'moderator'. This person then acted as a moderation convenor, calling and chairing a meeting of course tutors at which the group moderated their marking. The role of the moderator was therefore to lead and supervise a peer group activity rather than to operate as an external authority.

Each model had its strengths and weaknesses. Where there was one individual who fulfilled the role of both external examiner and external moderator there was clearly the scope for comparability of standards between subjects within a course and for attention to issues of coherence, integration and the learning experience of the student. However, there was not the same scope for comparability between courses, which was central to the operation of the national framework

and, in the case of open college AVAs, was also important for credit accumulation and transfer across the National Open College Network. Where the functions were divided between different individuals, coherence and comparable standards within a programme might be more difficult to monitor, although if the same individuals were working across several programmes comparability between them might be stronger. Clearly, where both these systems were combined the strengths of both were available. The challenge was to find experienced staff who were not only committed to access education for adults but who had the time to take on, usually in their spare time, what was an onerous and time-consumimg task. The size of the AVA and the number of courses it had validated was another factor – what was possible and desirable in a small AVA might not be appropriate in a large agency with many more courses.

There were also problems of resources: the more people involved in external examining and moderation the more rigorous it might be, but it was also more expensive. Although the move to new recognition arrangements might not be expensive compared to other award-bearing courses, it might nevertheless represent a significant increase over previous costs. In the Hertfordshire Access Consortium there was an arrangement that each member institution would undertake to release staff to act as moderators for each other, so that cash payments were not necessary, staffing costs were part of the cost of membership, and moderation therefore was not identified as a direct cost. Other AVAs, for example BAF, attempted to keep costs down by paying only nominal fees intended to be 'a thank you gesture – it doesn't really reflect the time spent on the work'. It remained to be seen whether there were enough individuals who were able to work effectively on that basis.

In the majority of AVAs observed, external examiners and external moderators were drawn mainly from staff in higher education, although there was frequently an intention to move towards the appointment of more staff from further education. Some had done this from the outset: for example, in the Hertfordshire Access Consortium each course has had two 'moderators', one from higher education and one from further education.

All AVAs made reference to the functions listed for examiners and moderators by the ACRG, although not all the AVAs included direct contact between the examiner or moderator and the students as a specific requirement. Some AVAs listed in considerable detail the duties, rights and responsibilities of external examiners and external moderators, sometimes as a result of negotiations with the ACRG, sometimes through consultation within the AVA on the implementa-

tion of a broad agreement with the ACRG, and sometimes as part of their continuous process of development. The more participative the AVA, the more consultation and debate which took place at different levels, and the more detailed the guidelines were likely to be. Other AVAs provided only broad guidelines and relied more on the professional judgement of those appointed; this was frequently a matter of principle – part of the way the AVA demonstrated 'lightness of touch'.

Some AVAs were clearly operating the system which had been agreed with the ACRG, although in at least one such case that agreement was inconsistent with the criterion of externality developed and propounded by the central body. Others were working towards the agreement and this was taking at least a year, sometimes longer, as it involved for some a major change in practice which could not be implemented quickly. There were problems for some in making the transition, and the ease with which the change was made depended on the extent of consultation and the degree of consent which had accompanied the agreement. Where tutors felt they had been fully involved in the decision, a planned programme of implementation was possible. Where tutors felt that consultation had not taken place, the introduction of the necessary changes was more problematic, particularly as there were usually cost implications.

Externality and accountability

The concept of externality was problematic. In its guidance to AVAs and course providers in 1990, the ACRG emphasised the need for examiners and moderators to be external to provider colleges and 'linked' institutions of higher education. Some moderation arrangements were set up originally with members of academic staff from the institution of higher education where most of the students were expected to seek entry. Not only were such people seen as appropriate and rigorous assessors acting on behalf of higher education, but their involvement was valued as a means of establishing understanding and credibility in the institution. Such arrangements had considerable advantages as the need to create and maintain such credibility was frequently ongoing. On the other hand, such arrangements were viewed as less satisfactory where a significant number of students, sometimes the majority, had progressed to other institutions. There were also likely to be considerable resource implications in changing from such a system.

The notion of a 'linked' institution was equally difficult for many providers of Access Courses. Where courses operated multi-exit arrangements, some progression routes were often more established

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than others and it was common for a moderator to be appointed from another institution. However, some course tutors reported changes in patterns of student progression and the prospect of significant numbers of students going to the same institution as the moderator. Sometimes this seemed to be associated with the efforts of moderators within their own institutions to encourage the admission of Access students.

In the peer group model of moderation adopted at MOCF and at some other open college AVAs the moderator was a convenor of meetings of course and subject tutors who engaged in moderation as a joint and shared activity. Externality in this context was a function of the composition of the group and had little significance for the role of the moderator as such. Indeed, it was argued by some that the concept of externality was antithetical to moderation as a peer group activity.

Most AVAs did not provide nor did they expect their examiners and moderators to participate in any training or staff development for the role. This was not true for the open college AVAs, some of which had several training events for moderators in the year following their approval by the ACRG. In London, these had focused on the role and function of the moderator and on the new system of credits. In MOCF they were a source of feedback on how moderators saw the system as a whole and the way they carried out their tasks. Such events provided useful suggestions which have led to modifications in other parts of the system; for example, the organisation of panels and the communication of conditions and recommendations.

The criteria for appointment of external examiners and external moderators were sometimes explicit and detailed. In the case of ALFA, the criteria were set down (and later amended) by the validation committee and were applied with some stringency. They included: a commitment to the AVA Access philosophy; a work history with adult students; a proven ability to act in a supportive and advisory way; experience and expertise in the field of study; experience of moderation; and experience of preparing students for higher education. In addition, there were criteria for exclusion: a member of staff in the same providing institution; a tutor on the linked higher education course; and someone connected or otherwise associated with the programme. While a moderator did not necessarily have to meet all the positive criteria, he or she would be declared ineligible on one of the negative criteria. In other AVAs, similar criteria were applied, although seldom stated in this way.

There were essentially two ways in which the appointment and accountability of examiners or moderators was managed. In some

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agencies, particularly the open college AVAs, the moderators were employed directly by the AVA and were part of the validation process. Development officers working with delegated authority from the appropriate committee would play a key role in consulting with the course team about their appointment and in ensuring that the criteria for appointment were applied. Moderators were paid by the AVA and addressed their reports to the AVA, with copies as appropriate to the course tutor. In other AVAs, for example BAF and SWAVA, the moderators were appointed by the providing institution, subject to approval by the AVA. In these cases the moderators were paid by the colleges and they normally reported first to the course team, with copies to the AVA; sometimes it was the responsibility of the course tutor to pass on the report as part of their own report to the AVA. In AVAs where the locus of authority was vested in the academic board of the lead institution of higher education (as, for example, in Newcastle), it was less clear whether the moderators were employed by the institution or by the AVA.

The two types of arrangement represented a different emphasis and balance in the sharing of responsibility for quality assurance between the providing institution and the AVA. They also reflected different ways in which the principles of rigour and lightness of touch were joined and judged.

Annual reporting requirements

Some AVAs (such as ALFA) had clear guidelines about about what examiners and moderators were required to comment on in their annual report to the AVA; others (like MOCF) had only recently developed such guidelines, as the reports they received previously did not always address the full range of issues required by the AVA; and others did not have guidelines and relied instead on the professional judgement of those appointed. In the open college AVAs, the reports of moderators were the sole form of annual reporting required, with reports expected from course tutors only if a response was required to a matter raised by the moderators. These annual reports did not usually include information about the profile of the student cohort, the withdrawal or transfer rate, and the pattern of progression into higher education. Most course tutors collected such information to a varying extent and used it for internal reporting purposes. Other AVAs (such as Newcastle and SWAVA) required a report from course tutors as well as from examiners and moderators. These were usually submitted to the appropriate committee in the autumn term following the end of the course and included details of the performance of the students and their destinations. Information about the profile of the

cohort in terms of gender, age, ethnicity or social class was limited and variable. At the time of the fieldwork, AVAs did not require this information in a form which could be aggregated and analysed in a systematic fashion.

There was no requirement on course tutors to obtain information about the progress of students once they had entered higher education. Some institutions of higher education had in place information systems which would enable them to monitor the performance of students in different entry categories, but few establishments had made much use of this data. Informal feedback was often given to individual tutors through their professional links with staff in local receiving institutions, and this was frequently formalised where there were guaranteed place arrangements. However, information on the progress of Access students was not systematically available to course tutors or AVAs.

There were some major problems about the timing of reports and the speed at which any necessary action might be taken. By the time reports were compiled and submitted, the last committee meeting of the academic year had taken place; later meetings were not usually possible as members had begun their summer vacation. It was invariably the first meeting of the autumn term before the committee was able to consider any problems, by which time the courses had commenced for the following year. The system depended therefore on moderators being in place at the beginning of the course, making visits fairly early on, and alerting all those concerned well before the end of the year if there were major concerns. In most cases, this was what happened. The scrutiny of the work of the students and the course as a whole was part of a continuous process, either through the work of a single moderator or through the work of consortium groupings; only the award of the overall marks or credits took place at the end of the course. However, there was a danger that during the transition to a new system of examining and moderation appointments might not be filled at the start of the course.

3.4 CURRICULUM ISSUES

A number of curriculum dimensions were touched upon in the previous section, including those relating to criteria for validation and the conduct of examining and moderation. In this section the focus is on how AVAs have chosen to interpret and implement key areas of curriculum philosophy and practice as set out by the ACRG. Such features as targeting, course duration and mode, curriculum co-

herence and integration, and assessment were the subject of different degrees of direction and emphasis from the ACRG. At the same time, changes in the curriculum of Access Courses were recognised by the central body and guidelines were kept under review. The result has been a complex and dynamic set of factors influencing the style and shape of Access programmes within the framework.

3.4.1 Targeting and equal opportunities

The priority or attention given to targeting particular groups and advancing equal opportunities has varied between AVAs. In BAF, for example, target groups were clearly defined, and reflected a strong emphasis on minority ethnic groups, partly because significant resources for Access provision had come from Home Office (Section 11) funding. Validation panels paid attention to targeting and looked for clear strategies to achieve it, although there was no requirement that courses had to report to the AVA about patterns of application, participation and progression. Panels frequently asked questions relating to race issues, challenging reading lists and questioning the ways in which mother tongue language skills were recognised in certain courses.

In SWAVA, where the existence of an 'effective equal opportunities policy' was a broad criterion for validation, considerable attention was given to the way teaching methods, course content, study skills and counselling support were appropriate to the target group or groups associated with the programme; in most cases women, the low paid, the adult unemployed or disadvantaged socio-economic communities. In ALFA, there was considerable discussion about the 'fit' between the curriculum – in terms of levels of study, modes of assessment and development of skills – and the target group(s) for the course. For example, the texts in literature, the topics in social science, the case studies in law were discussed in relation to the knowledge and skills which women and minority ethnic students might bring to a course as well as in terms of subsequent studies in higher education. This was considered particularly important in part-time courses, where the range of contents and the number of contact hours might be fewer.

In MOCF there was more variation in the panels observed. In one, a health sciences programme, there was frequent reference to the target group (black minority students) in terms of the level of work and how the prior experience and knowledge of students might be used as a vehicle for learning and motivation (for example, prior knowledge and understanding of sickle cell anaemia). In another, there were no challenges to what might be described as a Eurocentric

curriculum, with the focus being on what was taught rather than the students.

In Newcastle, the submission document to the ACRG for AVA status made no reference to equal opportunities or targeting, although the course review document attached as an appendix did refer to the foundation programme being aimed at 'four important categories' of such students: single parents, unemployed adults, people in un- rewarding occupations and women whose family responsibilities had diminished. The individual modules of the foundation programme did not specify target groups and discussion at approval was not concerned with equal opportunities issues. In part this was because what was approved was a syllabus or outline list of contents: it was the responsibility of the tutor and the providing institution (supported by inter-college module tutor groups) to teach and translate the syllabus in ways appropriate to the student group. Some packages of modules – such as a women into information technology programme – had been developed for particular target groups with external funding and in such cases issues such as creche facilities had been discussed at panel meetings. In general, as one member of the AVA explained, the significance attached to targeting and equal opportunities was related to the composition of the local population: 'it's difficult to address equal opportunities here because we don't have many ethnic minorities in the area'.

3.4.2 Course duration and mode

Although the ACRG defined a minimum course length for Access Courses – fixed at 500 study hours, including private study, project work and contact hours – this has been operationalised by AVAs in different ways. In one AVA (BAF) this guideline was interpreted in a very precise way: 'Full time courses of one year or longer should include at least 500 hours of class contact (including taught hours and tutorial contact) though considerably more may be appropriate for many courses. No time is specified for learner support (including private study and placements) for these courses, but panels must satisfy themselves that the time allocated is adequate'; and 'Part time courses of two years or longer should include at least 400 hours of class contact. The total of class contact and learner support on these courses should be at least 500 hours. Panels must satisfy themselves that the learner support is adequate for the requirements of the course ... One-year part-time courses of less than 500 hours class contact time are NOT acceptable'.

This interpretation of the guideline was justified on the grounds that the target groups identified for the courses needed this level of

contact time. Most existing programmes met this requirement, as the criterion was developed in part from an analysis of current practice. In the case of other courses which prepared students for higher education but which did not meet this level of class contact, course tutors were investigating alternative ways to obtain recognition for them. In particular, as the AVA moved to adopt a credit-based system within an open college framework, such programmes were likely to seek accreditation through this mechanism.

In most other AVAs, such an interpretation of the guideline was seen as restrictive and as erecting new barriers for many students, or even totally excluding them. Much of the suspicion about the national framework in its early stages was based on the fear that this was what the ACRG intended. As it became clear that a more flexible approach was possible, the criterion was more easily accommodated, although not universally accepted. There was still in many places an objection to it in principle: 'it represents time-serving – access should be about intellectual growth, and some people grow more quickly than others, they start from different positions'. There was a concern that it might encourage curriculum development in terms of the number of hours to be covered rather than the needs of the target group of students. There was also a fear that in times of financial pressure management in further education might seek to reduce the number of contact hours on larger full-time programmes, most of which were more than 500 hours. One AVA (MOCF) reported an enquiry from a senior member of staff in a college of further education asking if the kitemark could be retained while reducing the number of contact hours. While this was only a single instance, it served to fuel the fear.

Most AVAs interpreted the guideline as flexibly as possible. In SWAVA, for example, programmes were able to be validated which involved significant proportions of distance learning: 'It is recognised that the course aims may be achieved by a variety of mixtures of formal tuition and distance learning. However, the course should normally be a systematic study involving regular class contact over a minimum of 500 study hours, including private study, project work and contact hours'.

The open college AVAs were seen to recognise programmes for kitemarking purposes at or around a minimum of 16 credits, each credit consisting of a notional 30 hours of study time and adding up to approximately 500 hours. This inclusive and flexible definition of study time was generally welcomed as it permitted a diversity of provision to be validated, including part-time programmes of one year's duration. At MOCF, the opportunity for tutors to take into account not only the time spent by part-time students on private study

but also that involved in undertaking voluntary options and attending drop-in centres and weekend residentials, meant that the benchmark figure of 500 hours was exceeded for most programmes.

This recognition of the different balance of contact and private study hours on full-time and part-time courses was a key factor in including many courses. In ALFA, for example, the ratio of class contact to private study on approved part-time courses was 1:2.5 compared to 1:<1 on most full-time programmes (where there was greater variation). Across all modes, the contact hours ranged from as low as 180 hours to as high as 1047 hours and the total study time from 630 hours to 1260 hours. The differences were to be accounted for by the different starting points of the students, their personal and financial situations, and the general and specific requirements of the courses they intended to enter in higher education.

Among the five case study AVAs, none had formal arrangements for the assessment or accreditation of prior learning, or admission with advanced standing at the time of the fieldwork. Some tutors were reluctant to admit students with advanced standing or to exempt them from significant elements of the course, believing that group cohesion and identity was an important feature of the programme which might be undermined by such arrangements. These tutors often preferred to offer such students a different option where possible, such as a part-time version of a full-time course. However, several AVAs were engaged in discussions about how to develop more flexible entry procedures and a number hoped to introduce a formalised system in the future. In ALFA, for example, one college had submitted all its Access programmes in a modular form and in some cases in full-time and part-time versions. When the whole scheme was in place, it would provide a structure within which the recognition of prior learning and the use of advanced standing could be applied more easily. In MOCF, there had been attempts to develop and pilot guidelines for the accreditation of prior learning drawing on the professional judgements of tutors and moderators. In the case of the Greenwich and Lewisham Education of Adults Network there were formal arrangements for the accreditation of prior learning through portfolio preparation programmes. The ACRG had asked AVAs to report such arrangements so that guidelines could be prepared and good practice shared, but very few agencies had done so.

3.4.3 Coherence and integration

From the outset, the ACRG was concerned that the kitemark should be awarded to 'a planned programme of studies' or 'an organised educational experience'. Later on and in response to increased modu-

larisation within Access programmes, the ACRG emphasised the importance of a 'core or spine' of knowledge and skills which was the basis of a 'distinct and coherent programme'. As in relation to course duration and mode, there was considerable variation in the way AVAs interpreted this advice and determined the coherence of programmes.

In the large modular and inter-institutional scheme in Newcastle, the AVA validated discrete subject modules which, in order to meet the criteria for approval, were each required to specify the kind of higher education programme for which students were to be prepared. Coherence was therefore related to the level of work and the subject combinations appropriate to the intended progression route. Strategies for linking and transferring knowledge, skills and learning were not addressed directly. Rather the provision of a core of tutorial, counselling and learning support to ensure that students followed appropriate combinations and were properly supported were matters for the providing colleges, each delivering them in different ways. Approval as a providing college involved discussion about the form and scope of this 'core' provision.

In BAF, only 'courses' were validated, and, although these might include modular structures and different options, 'pick and mix schemes' were not acceptable: higher education, it was claimed, 'is not like that' and such programmes would not adequately prepare students. The AVA was, on the other hand, encouraging the development of modules in core areas, particularly mathematics, which were to be validated separately and made available for use in other courses. When the courses were validated they were required to indicate how these separately validated modules fitted into the overall package. Coherence here was related to the requirements of a course in higher education and the need of students to anticipate that experience. In other AVAs, for example ALFA, only courses or agreed combinations of modules had been validated. This was less a matter of principle and more because it was the common form of provision in the area. However, there was an increasing tendency for such courses to be organised on a modular basis and to share core modules (in study skills, information technology, mathematics, and English and communications) with other courses in a college. In these cases the course proposers were expected to demonstrate how separate modules might 'fit' together.

The notion of 'fit' was the most common way coherence was expressed and explained, although it was not always clear what that might mean in practice. In some cases, it related to the appropriateness of core skills to subject studies: for example, whether the level and content of the mathematics programme was suitable for the physical

sciences, social sciences or teacher education. It also involved discussion about the extent to which study skills were integrated into subject domains and the links which students were expected to make between the different fields of study. This suggested a search for coherence at a deeper level: 'it is to do with the way in which progression of learning skills and knowledge and understanding are developed. You can't judge that unless the modules are expressed in those terms and learning outcomes are made clear'. The open college model of accreditation was seen as a framework within which this concept of coherence might be developed but such a framework did not of itself guarantee that these questions would be fully explored. As elsewhere, practice was variable, with not all participants viewing the issue of coherence as significant or important.

3.4.4 Assessment

With regard to assessment, the influence of the ACRG on curriculum matters was strong in some areas and noticeably light in others. The standard conditions of approval for AVAs stipulated that no grades or passmarks should appear on the formal certificate awarded to the student. On the other hand, AVAs might provide an accompanying profile or record of achievement which indicated the grades, marks or other measures describing the levels and pattern of performance of the student across the programme. Furthermore, the ACRG chose not to recommend any form or style of assessment and AVAs were free to develop their own policy in this respect.

Frameworks of assessment

In some AVAs, for example the North and East London Access Federation, there was no common framework of assessment: courses operated different systems which were expressed in different terms – pass/merit/distinction, percentage marks, letter grades – and it was for each course team to define what was required for satisfactory completion of the programme. The AVA had no preferred model; it examined, commented on and approved as appropriate the scheme proposed, provided it was supported by a convincing rationale.

Many AVAs did however operate a common framework of assessment for kitemarked programmes although these differed between individual agencies. Newcastle and BAF illustrated the degree of variation which might be encountered:

Newcastle	*BAF*
Fail	Fail
Refer	
Pass (40%)	Pass (40%)
Merit (50%)	
Credit (60%)	Pass with Merit (60%)
Distinction (70%)	

Notwithstanding the requirement that certificates should not indicate grades, some course tutors were concerned that the existence of these frameworks and the availability of this information had encouraged admissions tutors to require higher level passes than might otherwise be the case. This tendency was claimed to be particularly evident where students followed three main subject areas, as admissions tutors might then be inclined to imitate A-level offers. Others offered a contrary view: that it was important that students were able to demonstrate relative strengths in different subjects and skills; and that it was in their own interests as well as those of admissions tutors that this was visible.

In some AVAs, for example SWAVA, there had been a local agreement that courses would have a pass level at 40 per cent and a higher level pass at 60 per cent, the latter being the standard considered appropriate for entry to first degree programmes in higher education. With the arrival of the national framework, it was agreed that students would be awarded a college certificate at the 40 per cent level and an AVA kitemarked certificate at the 60 per cent level. This was designed to ensure that students who were not ready or capable of study at degree level, but who had nevertheless completed the course to a reasonable standard and who were suited perhaps to some other form of further or advanced study (such as a higher diploma), were able to receive a certificate. As new courses had been validated greater variation had developed: some programmes had only one pass level (40 per cent or 50 per cent), others had retained the two levels but set them at different percentage points (pass at 40 per cent and higher level pass at 55 per cent). This had led some admissions tutors to offer places to students on the basis of a pass rather than a higher level pass, much to the concern of course tutors and AVA members.

The open college AVAs had adopted a common system of credits and levels as a framework for quantifying achievement. However, what constituted successful completion of a planned programme of study and qualified the student for a kitemarked certificate was not the same in all places. In MOCF, for example, which had operated a

system of credits for 10 years, the need in the past for a concept of successful completion had not always been necessary or appropriate. Students studied programmes and acquired credits according to their individual needs, aspirations and abilities and used them to secure access to different kinds of courses in higher education. Progression was usually built on different numbers of credits and levels depending on the backgrounds and accomplishments of individual students and the professional judgements of course tutors and admissions tutors. For some programmes, therefore, defining successful completion in terms of a single measure to be applied to all students was difficult and not altogether desired. A pilot exercise involving experienced MOCF tutors, moderators and officers was organised to make explicit the educational principles and professional judgements informing this process and to develop guidelines for wider implementation. While this was a useful and illuminating exploration, there remained a tension between a system built on individual credit accumulation and one premissed on a common threshold of achievement.

In other open college AVAs with different histories, for example ALFA, the issues were different. Here, prior to becoming an AVA, most Access programmes were clearly defined courses, carefully targeted and recruiting small and fairly homogenous groups of students. The courses usually included clear statements of the the level of achievement the students were required to demonstrate overall to complete the programme successfully. This usually differed from course to course and in each case was agreed with tutors from linked or associated courses in higher education courses which offered guaranteed places or other forms of enhanced access to successful students. Since becoming an AVA and operating with a framework of open college credits, all the programmes recognised by ALFA (except those concerned with access to teacher education) had moved to a common definition of successful completion set at 16 credits at level four, irrespective of the size of the programme and the number of credits available and followed. In some of the programmes providing access to teacher education the number of credits required at level four had been reduced to 12 (together with sometimes as many as 15 required at level three). In another course, a distinction had been made between the number of credits required to meet the 'general entry requirement' (16 credits at level four) and the number required to secure a guaranteed place (16 credits at level four plus 29 at level three in mathematics, English and other specified areas).

In this agency (and similarly in other open college AVAs) the 500 hours of study set as a minimum requirement by the ACRG had become equated with a view of what students must achieve on a

programme in order to be awarded a kitemarked certificate. Translated in this way, the 500 hours benchmark can be seen to reflect a new definition of the general entrance requirement, with some students required to demonstrate a volume and level of learning above this minimum threshold to secure entry to particular courses.

Forms of assessment

Most AVAs did not specify the form that assessment should take. The balance between written, oral and practical assessment and between portfolio, coursework and examination work was not usually prescribed, and varied according to the target audience for the course, their immediate and future needs, and the professional judgement of course teams. Some AVAs issued broad guidelines: SWAVA, for example, stated that 'both continuous assessment and examinations should be included' and 'portfolio assessment is encouraged'.

Some AVAs were more precise about their requirements but with different intentions in mind: BAF insisted that 'written examination must represent at least 40%', while the North and East London Access Federation stipulated that 'where exams are used, the total examined should not be more than 35% of the overall assessment'. In the modular scheme at Newcastle, the regulations were different for each module and a wide range of variation existed: one module had no examinations while in others as much as 70 per cent of the total marks was based on written examinations.

Assessment criteria

AVAs did not prescribe assessment criteria for Access programmes. In some AVAs (for example, the North and East London Access Federation), considerable attention was given to the detail of the assessment criteria and marking schemes as part of the validation process; in others (for example, Newcastle and BAF) there was at the time of the fieldwork little or no consideration of percentages or grades, since this was mainly a matter for external examiners and external moderators.

In the open college AVAs there was no attempt to specify requirements beyond the general statements of credit level: it was for individual course teams to operationalise these general statements and to determine the ways in which the achievement of learning outcomes was aggregated into credits. In some (for example, MOCF) the way in which this was done varied considerably: sometimes the credits and levels were, with some elaboration, integrated into the programmes as assessement schemes; sometimes they were 'bolted-on' to a scheme based on percentages. In others (for example, ALFA), there was a

general expectation that credits and levels would form the basis of the assessment scheme, although one course operated a 'dual system' of percentages and credits.

As will be noted in the conclusion to this report, the diversity of types and forms of assessment adopted by Access Courses has been a source of some confusion to admissions tutors in higher education.

Notes

1. See Elliot (1992) on the framework for Access development and provision in Wales.

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Concluding Commentary

In this concluding section, the introduction of the national framework is evaluated in terms of the original purposes and principles established to guide the formation and implementation of the scheme. A distinction is made between primary objectives, the strategic goals set for the national framework, and guiding principles, those qualities and features which were expected to be expressed in the process of approval, recognition and review.

4.1 INTENTIONS AND OUTCOMES

4.1.1 Primary objectives

Restricted remit

When first foreshadowed in the White Paper of 1987, the proposal to establish a 'comprehensive' framework occasioned both high expectations and new apprehensions. For some, especially those active in what was referred to as 'the access movement', the framework offered an opportunity to further the principles of affirmative action and enhanced entry for those disadvantaged by existing arrangements. For others, the scheme provided an opportunity to introduce some order and regulate standards in relation to a growing complexity and diversity of provision. Yet from the outset the parameters of the initiative were always more limited and circumscribed than sometimes assumed.

Firstly, access to higher education was interpreted as entry to first degree courses (rather than other levels of higher education) and was considered in terms of eligibility for admission (rather than positive progression). At the first meeting of the Convening Group in January 1988 it had been agreed to focus 'initially' on access to first degree courses but with 'due regard to the surrounds' such as the (then)

CQSW. Indeed, at the first meeting of the Steering Committee in June of the same year it was decided to co-opt a representative from the Business and Technician Education Council 'on the basis that many Access Courses were a route to the BTEC HND'. However, it was not until after most AVAs had been approved that the relevance of Access Course recognition for entry to 'sub-degree' programmes (especially higher diplomas) was re-visited.

The national recognition scheme was concerned only with 'the student's right to apply generally within higher education' (CVCP and CNAA, 1990a: para 13), even though it was expected that most students would progress to institutions and departments 'already linked with the Access Course' (ibid: 14). Recognition indicated that an Access Course provided 'a suitable preparation for entry', thereby 'meeting general entrance requirements' and offering students from such courses more 'choice' (CVCP and CNAA, 1990b: para 5). The immediate goal was to establish parity of esteem with sixth-form qualifications and vocational qualifications in order to confirm three generally recognised routes into higher education. The designation of Access Courses as a third route, nationally recognised and suitably kitemarked, was an act of accommodation and normalisation, not a justification for separate or special treatment. The role of the ACRG therefore was to administer the framework of recognition and ensure its integrity; the advocacy and promotion of Access Courses was the responsibility of others.

A second area of closure was related to the specificity of the criteria defining and delimiting Access Courses. In order that the wider currency of Access Courses was not diluted and devalued, it was necessary to exclude certain courses and activities from the scheme. This was achieved through adherence to 'certain key principles' and tight specifications regarding course length. Short return to study courses, preparatory programmes for overseas students and conversion courses were identified for exclusion at the first meeting of the Convening Group, where it was made clear that 'every Access Course should have some subject specific content' (Convening Group, 1988). These conditions were to become looser over time and by the end of the study not only was there general agreement within the ACRG that the guideline relating to 500 study hours would need to be revised but approval in principle had been given for 'youth access' programmes to be embraced within the framework. By the end of 1991, foundation year studies, either in-house or franchised to further education, had been added to the list of programmes which AVAs might validate.[1] However, the full significance of exclusion and inclusion was to be made more apparent with the passage of the Further

and Higher Education Act of 1992 where Access Courses which had been kitemarked within the national framework were to be eligible for support from the new Further Education Funding Council.

Another parameter limiting the action of the ACRG was 'its remit as a quality assurance agency and not a planning body' (ACRG, June 1989). Central direction and planning of provision were to be rejected, although 'a sensible pattern of arrangements' was aimed for and unnecessary duplication or monopoly influence avoided. While the central secretariat was active in promoting 'appropriate inter-institutional collaboration' (CVCP and CNAA, 1990a: para 24) and negotiating local boundary agreements, the role of the ACRG in relation to validation was declared to be deliberately detached. It was mainly through the approval of AVAs, where issues of a planning nature were addressed and where some AVAs were approved to validate only certain subjects or programmes, that the ACRG was able to influence the choices available to course providers. Any provider had the right to apply to any validating agency and it was individual AVAs, not the ACRG, which were in a position to shape the pattern of local provision. Although an important objective in the White Paper of 1987 had been to increase demand for certain subjects – particularly science, engineering and business-related social sciences – the ACRG has not been concerned with issues of workforce planning: the impact of the framework has probably been to stimulate rather than steer demand for places in higher education.

Finally, financial support for AVAs, Access Courses and Access students was declared to be outside the competence of the scheme. The resourcing of AVAs and Access Courses was 'a matter for local agreements' (CVCP and CNAA, 1989b: para 7) and, as a condition of approval, AVAs were required only to confirm that the arrangements described were 'feasible'. However, the ACRG was aware of the financial difficulties facing many AVAs and, in approving the transfer of AVA status from four AVAs to the London Open College Federation, it anticipated that it would need to deal directly with other proposals for reorganisation brought about by reduced levels of funding. Similarly, the revised framework for periodic review which was issued to AVAs in April 1992 stressed that the ACRG would be 'sensitive' to the resources available to them and the 'variable circumstances' which pertained across different regions. In securing an undertaking from applicant AVAs that resources would be available to implement their arrangements, the ACRG requested at the same time that these costs 'should not be borne by students on Access Courses' (CVCP and CNAA, 1990b: para 13b). A number of AVAs were unhappy with this condition since it prevented them from

treating Access students in the same way as A level or BTEC students who paid an examination fee for their course. In one AVA students had contributed to the costs of validation before approval and there were plans to increase that contribution in the future.

The narrow remit provided for the framework reflected the main way official policy on access to higher education was conducted at that time. It was also to some extent a product of the expectation from Government that resources would be limited to mount and maintain the scheme.

Comprehensive coverage

The framework was intended to be 'national' in reach and comprehensive in range. The national coverage has included England, Wales and Northern Ireland. Scotland was to be 'considered separately' and independent arrangements were subsequently developed through the Scottish Wider Access Programme (SWAP), a regional and consortia-led scheme launched by the Scottish Education Department in 1988 and based on modules and credits offered by the Scottish Vocational Education Council (SCOTVEC). Although more diverse and less directed than arrangements north of the border, the range of regions, sectors and institutions embraced has been impressive.

Forty AVAs had been approved by the end of 1992 and their geographical coverage has taken in rural as well as urban areas and inner city as well as suburban locations: only one area – in the south of England (Dorset, Hampshire, Wiltshire and Berkshire) – would seem to be less well-served. Membership of these agencies encompassed nearly all of the former polytechnics (32 out of 34), nearly 40 universities and university colleges, over 30 colleges of higher education, at least four Open University regions, and numerous colleges of further education; a further 10 higher education establishments had been identified as 'in association' with an AVA (eight of them universities) and eight had dual membership (seven of them universities).

Some institutions of higher education joined an AVA after it had been approved: for example, Loughborough University of Technology (which joined the North East Midlands Access Partnership) and the University of Keele (which joined the Universities and Colleges Access Network in Staffordshire and Shropshire). There were also some significant omissions from formal AVA membership, including the Universities of Oxford, Reading, Southampton, Bristol, Newcastle and London along with two former polytechnics, Bournemouth Polytechnic and Portsmouth Polytechnic.

Some of these were in loose association with their local AVA: for example, the University of Bristol had attended meetings of the Bristol

Polytechnic, Bath College of Higher Education and Partners Access Agency as an observer, and the University of Newcastle had recognised courses and admitted students in relation to the Newcastle Polytechnic and Partners Access Agency. Although the University Entrance Requirements Officer at the University of London was a member of the Consultative Committee, that institution has remained outside the scheme and has operated its own criteria of recognition. This had led to 'double validation' for a number of kitemarked Access Courses; and non-inclusion on the London-approved list for other kitemarked programmes. On the ground, however, practice was 'generally at variance with the official position', with some of the colleges of the University of London already 'fully involved within AVAs' (ACRG, June 1992). Some members of the ACRG had hoped that the approval as an AVA of the Joint Matriculation Board – a university-related examining body like the University of London – might encourage the institution to be embraced by the framework in the near future.

Relevant interests

At all stages of its development and at all levels of its operations, the question of representation on committees, panels and groups has commanded much attention. This has been particularly evident in the case of the central body where the under-representation of the further education sector on the ACRG (and, to a lesser extent, the Consultative Committee) and its non-representation on the Convening Group has troubled many course providers and practitioners. This was brought to the attention of these bodies on a regular basis, by individual members and by the ACRG secretariat, but the only major change in membership has involved the co-option of a representative of the SCAVA as an additional member of the ACRG. The replacement of the Consultative Committee by the Specialist Panel in October 1991 did little to broaden its membership, although the SCAVA was invited to make nominations for six places on the new panel. Less than one-third of the 46 members on the Specialist Panel were based in further education and only three out of 14 members of the ACRG were drawn from colleges which offered Access Courses.

The DES letter of invitation to the CNAA in 1987 had stressed the desirability of involving 'a number of relevant interests' and certain 'relevant bodies' were identified by name. Interestingly, although FAST and UDACE were included among these, the Further Education Unit did not figure as an interested party. At the first meeting of the ACRG it was agreed that the membership should be enlarged to include a representative from a local education authority but a propo-

sal from the Association of Graduate Recruiters (AGR) for a place for 'an employers' voice' was rejected: 'members were keen to discourage employers' preoccupation with levels of input to higher education, and to promote more attention to output measures' (ACRG, June 1989). However, a representative from the AGR was invited to join the Consultative Committee as was a representative from the Business and Technician Education Council. During 1990 a representative from the Department of Employment joined others from the Scottish Education Department and the Welsh Office Education Department as observers to the ACRG. The possibility of a place for a student voice in the activities of the central body would appear not to have been considered.

Rather than arrange for the Consultative Committee to meet and consult – it had been expected to meet 'about once a year' and to 'comment on developments' (ACRG, June 1989) – the ACRG preferred to rely in the main on the advice of the Joint Secretaries, based as it was on their active participation in a number of national, regional and local networks. As already noted, the formation of the SCAVA and the adoption of 'a more consultative mode' by the ACRG coincided with an internal debate about the future of the framework and an external environment in which the definition and recognition of Access Courses was being challenged by other forms of alternative entry associated with foundation year studies, franchise arrangements and modular credit systems. In this new climate, it was now considered 'best for initiatives to be brought forward to ACRG by AVAs themselves' – especially those 'at the cutting edge' – and for them 'to put on ACRG's agenda the issues which might extend the boundaries of operation and responsibility' of the scheme.

Speedy progress

The rapid progress made by the Steering Committee in agreeing and announcing the principles and procedures which were to underpin the formation of the framework meant that there was only slight slippage in the timetable set for approval of the first batch of AVAs. It had been hoped to announce these in September 1989 but this was delayed until January 1990. Although arrangements had been made 'in appropriate cases' for retrospective recognition to be given for courses which had commenced in the autumn of 1989, this was too late in most cases for students to have this indicated on their UCCA and PCAS application forms.

This speed and pace of activity was achieved (necessarily) at the expense of a consultative period which might have allayed some of the fears and concerns generated about the conduct of the exercise.

The first bulletin was issued as 'a statement of intentions' and was 'not intended as a discussion document' (CVCP and CNAA, 1989a: para 3), and the subsequent reliance on bulletins as the main form of communication with those in the field did little to reduce these anxieties.

In contrast to the progress demonstrated in the approval of AVAs, the compilation of a national register of 'recognised' Access Courses was subject to considerable delay. It had been intended to launch this in the autumn of 1990 so as to enable admissions tutors in higher education to be guided in their decisions about selection for entry in 1991. In the event, the register was not to appear for another two years, being delayed among other things by 'administrative problems' and the difficulties experienced by many AVAs in collecting and returning the information requested by the ACRG.

The need for AVAs to provide 'appropriate details from time to time, as requested by the ACRG, of each Access Course approved by the AVA under the scheme' (CVCP and CNAA, 1990b: para 13c) was a standard condition of approval. A questionnaire was distributed to AVAs in the summer of 1990 asking for relevant information and inviting AVAs to comment on the procedures adopted. By the end of 1990, only 22 AVAs had responded to the request and in many cases only summary data had been provided. In order to expedite matters, a shorter questionnaire was then issued but even using this there were still 12 agencies from which no returns had been received.

Because some AVAs had not been able to provide the information asked for and because many 'had not completed validation of some long-established, successful Access Courses' (ACRG, February 1991), it was considered 'misleading' to publish an incomplete list. Although by this time the closing date for the completion of PCAS and UCCA application forms had passed, it was agreed by the ACRG that a 'schedule' be circulated as soon as possible 'but with an appropriate warning that it reflects an interim stage in ACRG's development'. An 'initial draft register' was planned for distribution to admissions tutors and others in the summer of 1991 and a further edition was to be published in November 1991 'to fit in with PCAS/UCCA schedules' (ACRG and Consultative Committee, March 1991). A draft of the register and a summary list of recognised Access Courses was presented to the ACRG in October 1991 but again 'there were gaps to be filled' and 'only limited data were assembled so far, on each recognised Access Course' (ACRG, October 1991). These problems, together with the continued uncertainty surrounding the future role and funding of the ACRG (something which had delayed also the introduction of the framework for periodic review), meant that the

register would not be available for use by admissions tutors until the autumn of 1992.

Safeguarded standards

One of the key purposes of the national framework was to act 'as a safeguard against any risk of erosion of standards', to provide a 'more uniform basic framework' and 'to maintain rigour without imposing rigidity' (CVCP and CNAA, 1989a: para 18). While overall responsibility for quality assurance rested with the central body, it was the AVAs which were authorised to approve, for national recognition, those Access Courses which provided 'a planned programme of studies at appropppriate levels, whose coherence and integrity have been established by accreditation processes, and which involve at least 500 hours total study time' (CVCP and CNAA, 1990b: para 14). The 'essential point' was that a student who successfully completed such a programme was deemed to have 'achieved a level of attainment appropriate to higher education'; in other words, a level comparable or equivalent to the 'general entrance requirements' for admission to the first year of first degree courses (CVCP and CNAA, 1990a: para 46). The basic role of the framework was to ensure comparability and consistency in the standards set for approved courses (a function of validation) and the standards achieved by successful students (a function of external moderation and external examining).

At this stage in the evolution of the scheme, when many Access Courses were still in the pipeline awaiting validation and when the first cohort of students from kitemarked programmes had yet to complete their higher education studies, the question of safeguarded standards was best addressed in terms of the adequacy and effectiveness of the systems of quality assurance proposed by AVAs at the time of submission. In several of the early submissions – in common with the early bulletins – references to quality assurance on Access Courses were often general and indirect, and in some contrast to the information presented about other arrangements and procedures. Furthermore, it was only after the announcement of the first round of approvals that detailed guidance was issued about the need for AVAs to identify the duties and responsibilities connected with external moderation and external examininng.

As reported earlier, for most AVAs the first year of operation was concerned with finding a balance between lightness of touch and maintenance of rigour, and identifying and remedying loopholes or weaknesses in their procedures. Some had sought to be light in touch while being alert to inconsistency and unevenness. Others had opted for rigour with the intention of relaxing when confidence, experience

and understanding had been better established. All the AVAs observed in the study had referred back at least one course for further work and significant amendment. However, the overwhelming majority of courses were approved with particular conditions and recommendations. The impact of validation had been to tighten up, make more explicit, and clarify various aspects of the course design and documentation, rather than to induce major curriculum change.

Consistency between validation events within an AVA was, according to one participant, 'a bit like trial by jury – it depends to some extent who you get on the day, but it's a fair system on the whole'. Consistency was critically dependent on the role of the chair and the secretary of the panel, and – particularly where there was no development officer – on some continuity or overlap in panel membership. Although there was occasional and informal crossover of staff on panels in different AVAs, there was no system to ensure consistency between AVAs in the way they implemented validation criteria or developed their rules.

The need for AVAs to ensure that both the external moderator and the external examiner functions were provided for on recognised Access Courses was a late addition to the list of 'essential' elements to be considered at validation and some AVAs, as a condition of approval, were asked to provide 'clarification' of how they would provide for the 'ongoing monitoring' of these functions. A variety of models of external moderation and external examining were adopted in practice but, at the end of the first year of operation, not all AVAs had in place the arrangements approved by the ACRG and not all the arrangements approved by the ACRG would seem to have met the criterion of 'externality' set out in the later guidance. Externality was problematic for many AVAs. In a few agencies the application of this dimension had been resisted as a matter of principle, while elswhere more practical problems had weakened its expression. In most AVAs the notion of externality did not extend outside the boundaries of the AVA and, as in the case of validation, there were no formal mechanisms for comparing standards achieved and assessed on courses in different AVAs. Some groups of AVAs had arrangements for inter-AVA involvement but these were generally loose and somewhat *ad hoc*.

Any search for comparability or equivalence between the standards displayed on different courses, whether within an AVA or between AVAs, was likely to be a complex business. An Access Course in humanities and social sciences based on 500 study hours or 16 open college credits was very different from one of 1480 hours or 49 credits leading to teacher education or 1100 hours or 37 credits leading to

engineering studies. Such differences were seen to reflect the 'differential needs of the students in preparation for higher education', 'the different starting points for Access programmes' and the specific requirements of courses in higher education. Put another way: 'There is a relationship between course length and course objectives, the achievement of the latter of which is more important. The course should take as long as is necessary to achieve its objectives' (CVCP and CNAA, 1990b: para 41).

Because the objectives of many Access Courses were determined by the need to meet the specific entrance requirements of particular courses in higher education (not the general entrance requirements of the institution), the standards or outcomes achieved on Access programmes were always likely to be variable. Rather than demonstrating a minimum level of attainment appropriate to higher education, it was probably more often the case that successful completion of a recognised Access Course indicated a level of achievement above this threshold. This distinction was most transparent in the case of open college AVAs where the system of credits and levels provided a direct measure of the volume and range of learning required for the award of a kitemarked certificate, as opposed to meeting the general minimum requirement of 500 hours (or 16 credits at level four): 'For a traditional Access Course of one year full-time (or part-time under the 21 Hour Rule), regulations may specify a "programme" of (say) 30 credits. In such a context, Access Course certification should *not* be equated with success in 16 credits alone. The assessment in relation to the whole package must count' (CVCP and CNAA, 1992b: 15–16).

The problems encountered in defining equivalence and comparability between programmes of markedly different length, subject and target group were mirrored in the different ways AVAs had sought to distinguish between Access to first degree and Access to other kinds of higher education qualifications. Some AVAs had excluded Access to HND from their kitemarking arrangements; some had approved courses with two levels of pass – a higher one appropriate to entry to first degree courses and a lower one appropriate to HND programmes; and some had kitemarked discrete Access to HND courses, clearly identifying the programmes as such in the title and documentation. AVAs were subsequently advised that it was consistent with their agreement to validate Access to HND programmes for standard Access Course certification, although separate status for such courses within the framework was not supported. This was unlikely to remove the considerable confusion (and variation) which characterised attempts to come to terms with levels and standards in this area.

Increased availability

It was believed by those responsible for devising the initiative that the existence of a national framework would 'give further impetus to the development of Access Courses and the admission of their students to higher education' (CVCP and CNAA, 1989a: para 1). The White Paper on higher education in 1987 had made reference to developing a framework 'within which the availability of well-devised access courses can be increased' (DES, 1987a: 10) and this was amplified in the framework documents to suggest the scheme 'will support and extend opportunities' for entry to "all" institutions of higher education (CVCP and CNAA, 1989a: para 5).

An assessment of the impact of the framework in extending opportunities in these terms – at national and local levels – was difficult to make at this early stage. It was not until late in 1992 that the ACRG was able to publish a national register of 'recognised' Access Courses and provide evidence of the growth in the number of Access Courses over this period. By July 1992, some 1135 Access Courses had been identified as being 'in accordance with definitions established by ACRG'; 593 had already been recognised by the ACRG, 376 were 'in the pipeline' awaiting formal validation or had otherwise been notified to the ACRG, and a further 166 had been reported to the Department for Education but not notified previously to the ACRG (CVCP and CNAA, 1992b: 17). This may be compared – though in no way directly – with the 577 programmes reported for England, Wales and Northern Ireland in the *Access to Higher Education Courses Directory* published in 1989. Whether this pattern of 'dramatic growth' was due in some way to the advent of the framework was a complex question, especially since this initiative coincided with a period of accelerated demand and unprecedented expansion in higher education. Such an assessment would continue to be difficult given that national data on Access Courses and, more particularly, their students have yet to be collected on a continuous, systematic and reliable basis.

According to the national register, it was possible to study full-time on 58 per cent of all kitemarked Access Courses (compared with only 38 per cent of all Access Courses identified in 1989). Many more Access Courses were now offered on a flexible and mixed mode basis and the range of subjects within Access programmes had 'widened appreciably' (ibid: 23). Some 277 colleges of further education were identified as providers of Access Courses and this category of establishment accounted for 86 per cent of all such programmes (81 per cent in 1989). Only about eight per cent of kitemarked programmes were located in institutions of higher education, a smaller proportion than that indicated in 1989 (16 per cent).

A large proportion of all Access Courses continued to be found in London and the other metropolitan regions, but there was also some evidence of growth in more rural areas – for example in Wales. At the same time, there were indications that a number of Access Courses might be disappearing as they became part of franchising arrangements of various kinds. The number of courses, however, was not of itself a clear indication of availability and opportunity, as the number of places might vary depending on the structure of the programme: for example, from 12 places on a single subject discrete 'course' (still the most common form of Access programme) to 200 on a large modular scheme.

Wider currency

As recounted in the interim report of the evaluation study, the idea of 'wider currency' – generally associated with credibility, acceptability and parity on a national basis – was a core rationale for the framework enterprise: 'It has shaped the structure and *modus operandi* of the national framework, is the major motivation for agencies to apply for recognition, and is the main incentive for courses to seek validation'. The notion of wider currency was the conceptual hinge which joined 'safeguarded standards' and 'increased availability', and was the goal around which consent for the scheme was mobilised and managed. In the early days in particular it was 'a theme that runs through the aims and expectations, both positive and negative, of all the participants and provides a common strand in otherwise diverse views and approaches' (Parry and Davies, 1991: 19).

Although an integrating element in the formation of the framework, the value of the currency was reckoned in different ways by (or on behalf of) the major stakeholders in the initiative: for course providers, for admissions tutors in higher education, and for students attached to Access programmes. In each case, any estimate of the impact of the framework must be qualified and provisional, given the focus of the fieldwork on the first year of operation of selected AVAs and the limited empirical information available to the central body about patterns of activity and participation on the ground.

From the beginning, some course tutors and others in institutions which provided Access Courses were extremely concerned that the framework would impose criteria, conditions and structures, and tend to standardise provision; and a small number were actively hostile. There were, however, no boycotts and considerable if sometimes reluctant consent has been achieved with the realisation that flexibility and negotiability were still possible. A few of those who were particularly apprehensive chose to hold back from seeking validation and

some of these were considering 'staying outside' since their students had experienced no apparent disadvantage as yet. If they were to perceive adverse effects and consequences they would act to protect the interests of their students.

Following validation, course tutors reported no marked shift in the ease of progression for their students, one way or the other. However, in relation to their own position, they had mixed experiences of the framework to date. Some felt supported in relation to key features of the programme, such as time for tutorial work and counselling; and there was some perception of improved status for Access programmes – particularly in colleges where little or no provision existed previously. Others felt more threatened, especially in relation to course length and saw the framework as an additional burden. Others felt it had made no difference. Much was dependent on the experience of course tutors and providing institutions, and the way in which the AVA had chosen to interpret its role and function.

One of the main objectives of the framework in terms of wider currency was to increase the confidence and understanding of admissions tutors in higher education so that they would be more prepared to admit students from Access Courses. The evidence in this regard was somewhat anecdotal and the timing inappropriate for definitive judgements. However, a number of issues had emerged.

Among admissions tutors there was clearly an expectation that the framework would bring about some standardisation, particularly with regard to the structure of assessment on Access programmes. This was never an intention of the central body; indeed, it was hoped that a 'diversity of provision called Access Courses may continue to flourish' (CVCP and CNAA, 1989a: para 18). In general, this diversity had been maintained. Although open college forms of validation and accreditation had sometimes – as in inner London – involved a shift from a number of different arrangements to a common framework of credits and levels (but not necessarily a common course structure), nationally and within many AVAs there remained a range of different systems of assessment and levels of pass.

The considerable diversity in the degree to which AVAs prescribed the framework and form of assessment on Access programmes was, for many admissions tutors, a source of additional confusion; and not the simplification which many had hoped for. In some AVAs there was no common framework at all. Others operated a common framework within their AVA but this would differ from neighbouring agencies. For example, some AVAs had only one level of pass while others distinguished between a 'pass', 'merit', 'credit' and 'distinction'; some used alphabetic grades while others employed percentage

points; and the level of overall pass in one AVA might be 40 per cent, in another 50 per cent, or 60 per cent, or 16 credits at level four, or 33 credits at level four, and so on. A similar variety was reflected in the balance between coursework and examination assessment and between written, oral and practical assessment: most AVAs did not specify the form it should take; some prescribed these more precisely with minimum or maximum percentage marks for examinations; in one AVA the regulations were different for each module – one module had no examinations while another had as much as 70 per cent of total marks on written examinations.

Amidst this diversity there was evidence of an increase in the number of new courses and a perception among admissions tutors – particularly apparent in some universities – that more applications were coming from students on programmes beyond those known locally. Admissions tutors had been faced therefore with more applications from students on Access Courses with which they were not familiar and they had less understanding of what a sensible offer might be in relation to subject-specific requirements or how to make offers which would produce the 'best' students. Although now available, the register of recognised Access Courses – 'the planned expression of Access Courses "currency" on a national basis' (ACRG and Consultative Committee, March 1991) – was unlikely to provide sufficient detail to enable admissions tutors to make an informed judgement about the nature of the course and the character of its assessment. They would still need to refer to the course tutor and course document for that programme if they wished to pursue a particular application. It was not clear that this would be a feasible or practical proposition given the pressure of demand on places in many disciplines.

However, there did seem to be a growing recognition at institutional level of the problems faced by admissions tutors in keeping abreast of these and other changes. Many institutions of higher education – either individually, in groups, or through their AVAs – had organised workshops, seminars, conferences and other staff development events to address these issues. At least in the short term, the national framework and the operation of the AVAs had assisted in this learning and adjustment. It was clear, however, that Access Courses represented only one element in a broader set of changes influencing admissions policies and practices at institutional level.

The group to whom wider currency was ultimately directed was of course students themselves, especially those contemplating a return to study and a possible passage to higher education. A particular concern informing the establishment of the national framework was that many students might be restricted in their higher education

course by Access Courses having links, formal or informal, with local establishments of higher education. This might be particularly the case where there was only one institution of higher education in the local area or where the Access Course was in-house or linked strongly to one institution or department. While it was recognised that many Access students would also be constrained by their personal and domestic circumstances, it was felt that those who did have greater flexibility and mobility should have the opportunity to gain admission to a wider range of institutions. In support of this notion of currency, the White Paper of 1987 had expressed its preference 'wherever practicable' for Access Courses which were 'designed to offer access to higher education more widely'. Significantly, it was in relation to those geared to a particular receiving institution – which the Government 'accepts the place of' – that the need for an 'appropriate validating authority' was mainly directed: 'so that the standards of Access Courses tailored to a specific higher education institution are suitable for entry to similar higher education courses elsewhere' (DES, 1987: 10).

There are no statistical data in existence to indicate whether students had been able to gain admission outside their locality and region or beyond the linked arrangements for their Access Course. Some well-established Access Courses had always seen a minority of their students move on to more distant institutions and this did not appear to have significantly changed. However, some course tutors reported that younger students, those in their early twenties in particular, had sought and gained admission to institutions further afield (and which previously had not been sympathetic to Access students). This perception, coupled with reports from some admissions tutors that more applications had been received from outside the locality or region, would seem to suggest some movement in the currency of these programmes which might be to the benefit of some students.

In the decade before the introduction of the framework there were regular suggestions that Access students were perceived by others and often by themselves as rather like second class citizens, both on their Access Course and when in higher education. The increased status for their Access Courses reported by some tutors and an increase in their own confidence following validation was in turn likely to have brought benefits to students and increased their confidence about applying for a place in higher education.

One of the key concerns of students on Access Courses was their current and future financial situation: issues which fell outside the remit of the framework, although the ACRG had 'strongly recommended' that the costs of validation should not be borne by individual

students. Nevertheless, some local education authorities had decided to give discretionary awards only to those students on kitemarked programmes and in this sense some students had benefited more than others from national arrangements. This source of protection had not been available to other categories of students who might have been displaced or disadvantaged by this new hierarchy of worth. It might be that the existence of a kitemark had provided a relatively simple and tidy way of rationing resources at a time of increased pressure on education budgets.

Catalyst for innovation

The DES letter of invitation to the CNAA hoped that the national framework of recognition would 'act as a catalyst for innovation' within institutions of higher education (DES, 1987b). What this might mean or how this might be achieved was not explained in the letter and this purpose was not pursued as an explicit goal by the central body. It was however identified as an 'additional' role for AVAs alongside 'opening up Access routes to higher education' (CVCP and CNAA, 1992a: para 2.5.3a).

What was probably meant to be signalled in this statement was the idea that formal arrangements for the validation of Access Courses and increased participation by their students in higher education were themselves likely to stimulate change inside universities, polytechnics and colleges. The need for establishments of higher education to 'adjust' their entry requirements and procedures, and to adapt their course designs and teaching methods to accommodate new types of students had been emphasised in the White Paper of 1987: 'the stimulus of change should help to sharpen awareness of the different types of achievement that properly form part of the output of higher education' (DES, 1987a: 9).

While it is likely that the rapid expansion in numbers of young and mature students entering higher education since 1987 has brought about changes in teaching and learning, it will be difficult to separate out in any analysis or assessment the contribution which framework arrangements might have made to these developments. Both the recency and the complexity of the changes experienced by further education and higher education should caution against any judgements offered at this time.

Claims were, however, made by AVAs about the contribution made to change in a local institution. For example, the annual report of the Hertfordshire Access Consortium in 1989–90 was confident about the influence it had exercised on the main institutional provider of higher education in the AVA: 'With encouragement from the Access

group, the Polytechnic has reviewed its own admissions practices, support arrangements and publicity materials, and has provided staff development opportunities to increase knowledge and awareness of the special needs of Access Course students among members of academic and administrative staff concerned with student admissions'.

The assumption underlying the few references to 'a catalyst of innovation' was that this applied to the realm of higher education rather than further education. This was consistent with the view that validation and recognition were ultimately about respecting existing diversity rather than challenging or changing it.

4.1.2 Guiding principles

It was at the first meeting of the Convening Group, as far back as January 1988 and before the Steering Committee had been created, that certain 'fundamental' principles were established which were to guide the development of the national framework at each stage. It was agreed that the arrangements to be established should be 'devolved', 'transbinary' and 'light in touch'. The essential concern was to balance the requirement for quality assurance against the need to avoid undue bureaucracy and to 'avoid any new barriers' to extending opportunities for entry to higher education (Steering Committee, 1988). The importance of 'collaborative' relationships and partnerships was a later addition (CVCP and CNAA, 1990b: para 6), although always part of more general discussions about the operation of the scheme. By the end of 1992, four 'key' principles were seen to characterise the framework – 'devolution, local diversity, collaboration (of providers and HE receivers), and lightness of touch' (CVCP and CNAA, 1992b: 6) and amongst these the promotion of 'collaborative relationships' was also considered a 'prime aim of the scheme' (CVCP and CNAA, 1992a: para 3.4.1).

'Devolved'

Devolution in quality assurance was the means by which the central body looked for 'rigour, but without rigidity' in the operation of the framework and accepted 'a variety of Access Course provision and diversity of models for Access Course validation' (CVCP and CNAA, 1990a: para 51). The ACRC had overall responsibility for the scheme but it was not involved in the scrutiny of individual Access Courses: its role was intended to be detached and its recognition of Access Courses indirect. It was for AVAs to approve Access Courses, to determine the detailed arrangements for their validation (and review),

and to operate certification for students. It was for the ACRG to satisfy itself as to the suitability of the processes of validation and to award a kitemark to approved Access Courses.

These lines of responsibility and divisions of labour were generally well understood, but there had been some confusion about the procedures to be followed between the approval of a course by an AVA and the award of a kitemark by the ACRG. Some AVAs and colleges had advertised a course as kitemarked after formal approval by the validation committee of the AVA. This did not acknowledge the role of the ACRG at this stage in registering approved courses and scrutinising the reports on each course submitted by the AVA. As made clear in the first edition of the register, it was not until the AVA had received a letter of acknowledgement from the ACRG secretariat that a course was deemed to be kitemarked. It was at this point that a kitemarked Access Course would go on to the register.

The tardiness of some AVAs in reporting details of approved courses was a matter of some concern and, following publication of the first edition of the register, the ACRG intended to conduct a six monthly update survey to secure this information. The need for the ACRG to remind AVAs of its responsibility and authority in these matters was an illustration of the degree of devolution to be found in the system: 'ACRG accepts that some forms of "leverage" are needed to give AVAs an incentive to report details of approved Access Courses' and, if encouragement failed, 'ACRG's sanction is limited to withdrawing the AVA's licence' (CVCP and CNAA, 1992b: 14).

Clearly, the freedom and discretion able to be exercised were limited by the standard and the specific conditions attached to the approval of an AVA. The standard condition which required 'an explicit commitment from the AVA that it 'will conform with and abide by the principles and guidance set out in the documents published by the Access Courses Recognition Group' (CVCP and CNAA, 1990a: para 50) was always available to steer or direct the activities of AVAs, but there were also specific conditions which restricted the remit of certain agencies. Some AVAs were only approved to validate certain types of programme or courses in particular subject areas; and some agencies were identified for an early review. However, it was only through the process of registration for kitemarking, the mechanism of periodic review and, exceptionally, the procedures established to deal with appeals and complaints that the ACRG was concerned with the conduct of validation at local level. Furthermore, the central body had decided against retaining reserve powers to approve Access Courses in its own name. To date, the ACRG has not been required to consider appeals and complaints from course providers or applicant

agencies; nor has it needed to act as an 'adjudicator', although it was not clear in the terms of reference of the ACRG what this was supposed to refer to (ibid: para 2.4.2d).

The 'devolved regime of validation' which the DES had seen as 'desirable' for Access Courses (DES, 1987b) was part of a broader policy pursued by the CNAA at that time to devolve responsibility for course validation to member institutions. This movement to institutional maturity and autonomy accompanied the formation of the framework and made it more difficult for the central body to contemplate any actions which might be seen to undermine such new-found and hard-won independence.

'Transbinary'

When first conceived and created, the framework was part of a binary system of higher education, with separate funding councils defined for the universities and for the polytechnics and colleges, and with the CNAA responsible overall for standards outside the universities. Six years later, following the passage of the Further and Higher Education Act of 1992, the national framework was carried into a post-binary world with a single funding council established for higher education, new arrangements for quality assurance (and the winding up of the CNAA), a central agency for admissions, and university titles approved for former polytechnics.

The establishment of the framework was an early, if smallscale, example of formal co-operation between the (then) two main sectors of higher education. This was expressed most clearly in the 'joint ownership' of the scheme by the CNAA and the CVCP, and in the equal representation accorded to the polytechnics and the universities on the ACRG. The coupling of these interests was a significant achievement, not least because at the beginning it was the CNAA which had been considered 'best placed to take the lead in developing the framework required' (DES, 1987b). While its devolved regime for validation and its 'increasing interest' in Access Courses made the CNAA a suitable body to establish the scheme, one likely to prove acceptable to many course providers, there was also a need to widen the currency of Access Courses across the system 'as a whole' (ibid), including the universities.

For some observers and many practitioners this was the major task facing the framework. It was also a key issue for officials in the DES. According to the letter of invitation to the CNAA, Access Courses developed 'in partnership' between individual colleges of further education and institutions of higher education (mainly the polytechnics) had sometimes been viewed with suspicion by 'other estab-

lishments' and it was important to consider 'how the universities might relate to any validation arrangements which the CNAA might establish' (ibid). Although the universities were represented on the Steering Committee in smaller numbers than the polytechnics and colleges, there was agreement on all sides that the scheme should be presented as 'a transbinary initiative' in which the CNAA was 'a handling agent' acting on behalf of both sectors of higher education (CVCP and CNAA, 1989a: para 9). Indeed, in accepting the invitation from the Secretary of State to administer the recognition scheme jointly with the CVCP, the CNAA made reference to the planning period as 'not only valuable in its own right but provided an excellent example of transbinary co-operation' (ACRG, June 1989).

One outcome of this collaboration has been the participation of most of the universities in the scheme. Some major players remain outside the framework and at least one universities-based AVA exhibited considerable unease about joining a system which was perceived to be led by the polytechnic sector. Yet in most AVAs – 23 out of 39 – both universities and PCFC institutions were in full membership and a further five AVAs would be added to this transbinary group if those universities described as 'in association' were to become full members. In some of these transbinary AVAs, the membership of universities followed rather than preceded the approval of agencies.

'Collaborative'

The importance of 'a collaborative approach' and 'partnership' in the arrangements for quality assurance in respect of Access Courses was to be signalled more positively and applied more firmly as the framework developed. In their applications for AVA status, agencies were expected to demonstrate how providers of Access Courses were involved in the organisation of the AVA and in the process of validation. As noted earlier, the weight to be attached to collaborative arrangements, consortia models and experience of the validation of Access Courses has figured strongly in the approval process, and was reflected directly and deliberately in the first batch of submissions to be approved. Consortia arrangements which demonstrated 'appropriate partnerships' were claimed to have 'Considerable merits', although single institutions were invited to apply 'as well' (CVCP and CNAA, 1989b: para 20).

Of the 40 AVAs which had been approved by the end of 1992, only nine might be defined as single institution arrangements and, significantly, the one application rejected to date was a submission from a single institution agency. Moreover, most of the applications from single institution agencies (or two such institutions acting jointly)

raised doubts and concerns among members of the working parties about how far course providers were involved 'at all levels' in a collaborative scheme. Meetings were required between the working party and members of the applicant agency to probe these questions and in some cases this had resulted in a significant modification of the original proposal to satisfy the criterion of collaboration. The collaborative dimension was cited as a major factor delaying the approval, over nearly two years, of an application from the Joint Matriculation Board, a former matriculation body and a 'different kind of agency'. It was in discussions about this submission that the notion of collaboration sometimes appeared to acquire a metaphysical status, an expression of 'the spirit of Access'.

On the evidence of fieldwork with selected AVAs, collaboration between institutions and organisations on the ground had generally worked well. Some agencies had provided a mechanism for the management of competition between colleges of further education in the region and between institutions of higher education in membership of an AVA. Elsewhere AVAs were less able to exercise this kind of influence, although the agency might provide a forum for addressing if not reconciling these tensions. At the level of individual Access Courses, the impact of AVA activity, at least in the early period, was mainly to formalise existing arrangements rather than create new relationships. The exception to this pattern was in areas where little provision had existed prior to the establishment of the AVA. In some agencies, there were debates about the extent to which the work of development officers might undermine direct relationships between staff in the different sectors or, conversely, might promote greater mutual understanding by bringing groups together to work on common problems. In most cases, the process of validation drew on a much wider group of people than would meet together ordinarily and in this way the procedure of recognition was able to extend the network of relationships available to course teams.

Membership of AVAs and collaborative relationships within AVAs were mainly seen to embrace colleges of further education and establishments of higher education. In many AVAs there was only marginal involvement of adult education institutes, community education centres, advice and guidance services, and other community organisations. This was partly because they were not major providers of Access Courses (only about four per cent of kitemarked programmes were located in these settings) and partly because their membership was difficult to sustain at a time of reduced resources (and attendant reorganisation) for these agencies. However, the real balance of power in AVAs was not always the same as the formal

representation on committees and panels. Historical, ideological and personal factors were significant in the micro-politics of decision-making, and the involvement of practitioners, especially those in further education, was often more difficult because of discontinuity in attendance at meetings due to teaching commitments.

'Light in touch'

The idea that the arrangements proposed for the framework would be 'low key' and 'light in touch' (CVCP and CNAA, 1989a: para 7) was only partly related to the devolved regime to be adopted for validation, the slim resources available to the initiative and the heavy commitments of busy people. It was also to do with the need to develop a sufficient consensus for 'speedy progress' to be made and to reassure the institutions of higher education that old-style CNAA procedures would not be reproduced in a 'transbinary' guise. Inevitably, this meant some trade-off against tight specification and regulation of standards which some had preferred: one member of the Consultative Committee had written to the ACRG worried lest 'our criteria' be 'rigorous and mandatory rather than permissive' (ACRG, October 1989).

The position taken by the ACRG emphasised that an approach 'which features lightness of touch must not mean one without rigour' (CVCP and CNAA, 1990a: para 51). Both in terms of the procedures for approval of AVAs and the criteria for the recognition of Access Courses, the central body had attempted to achieve a 'balance' between 'lightness of touch' and 'firm control': an actvity performed 'with a marked level of success' according to the Convening Group but experienced more variously by AVAs (as 'too light' by some; as a 'sledgehammer' by one; and as 'a closed system not open to negotiation' by others).

The principle of lightness of touch has enabled the central body to be alert and responsive to changes in the environment in which AVAs operated, especially the uncertainty and instability in their financial situation. The ACRG has been able to act quickly when changes to agreements were requested (as in the decision to approve the merger of four inner London AVAs into a single agency) and sensitively when concerns were expressed about the application of common criteria for periodic review to the variable roles and circumstances of AVAs.

The principle was also apparent in the decision not to undertake detailed work in relation to subject specific Access Courses and not to offer detailed guidance on subject issues for AVAs, course providers and admissions tutors in higher education. However, it was in this

same area that the ACRG acknowledged the need for a more central and proactive stance. In discussions with other validating and accrediting authorities about the acceptability of recognised Access Courses, the ACRG 'has found it difficult to maintain a hands-off approach' (CVCP and CNAA, 1992b: 13) and has acted determinedly and assiduously to secure appropriate recognition for the kitemarked certificate.

The pursuit of lightness of touch produced some confusion as well as some freedom. This was particularly evident in the first year of operation of the framework. For example, it was not clear: how retrospective recognition was to be applied to courses approved in advance of the award of AVA status; at what stage an AVA was formally approved; at what point an Access Course was finally kitemarked; and how AVAs were expected to accommodate to the 'evolving' principles and procedures set out in documents published by the central body. For the ACRG, these were all part of 'the learning curve' experienced by any new body and 'its procedures will develop in the light of experience' (CVCP and CNAA, 1990b: para 9). Some of these questions had been worked through by the end of the first year but a number had still to be resolved, especially where resource implications were involved.

Finally, it was not clear in the published guidance whether 'lightness of touch' was to apply only to the relationship between the central body and the AVAs or whether it was intended to pervade the whole system. Some AVAs had incorporated this principle into their validation activities, but others had decided to aim for rigour even if that meant a 'heavy' touch. This was often related to the range of experience amongst AVAs, with those with a track record of approving Access programmes being more confident about their reputation and those which were new to validation being 'tough' at first in order to establish their credibility. Both approaches were subject to modification as those with less onerous procedures moved to correct discrepancies and as those with more exacting procedures encountered difficulties in completing the cross-checking required and managing the paperwork generated. Here again there were echoes of attempts by the central body to achieve rigour without rigidity in a context of limited resources.

'No new barriers'

From the beginning the central body sought to allay fears that the framework might erect new hurdles for mature and non-traditional students wishing to enter higher education. The framework was intended to cover 'only part of the spectrum for alternative routes into higher education' (CVCP and CNAA, 1989a: para 6): 'No new barriers

to access to higher education are intended' (ibid: para 7). The 'routes' which were the subject of these assurances at this time were those arrangements which enabled individuals to qualify for entry to higher education, especially full-time first degree courses, on the basis of 'other' qualifications, learning and experience. There was a concern that these forms of 'direct' entry to the initial or later parts of programmes in higher education might be undermined or displaced by the language of three 'generally recognised' routes which followed the White Paper of 1987.

Rather than Access Courses becoming the single, dominant channel for adults intending to apply for higher education, other forms of entry, including foundation year studies and franchised arrangements, were to expand rapidly in the early 1990s, sometimes at the expense of free-standing Access programmes. Far from delaying or distorting the development of alternative pathways, the ease with which some Access Courses were converted into the foundation years of extended degree programmes suggests that the framework was probably a neutral influence on this process.

Fears had been expressed that students who might formerly have been admitted to higher education directly or on the basis of a short return to study course were now being 'squeezed out' of the admissions process by the so-called 'third route'. Increased demand had of course created greater competition for places in many areas, but evidence was partial and anecdotal regarding the impact of the framework on various categories of applicant. Indeed, the full impact of the scheme on Access applicants and others might only begin to be apparent in relation to later cohorts of entrants (when the majority of courses currently awaiting validation were kitemarked and when the national register was sufficiently known and comprehensive to inform the decisions of admissions tutors). At the time of the fieldwork, the evidence, albeit slight, seemed to suggest that where there were strong links and where confidence had been established through the experience of successful progression, the absence of a kitemark attached to a preparatory course was not significant for those students wishing to enter a local institution. This might, however, prove to be much more of a problem for newly established return to study or short preparatory courses.

A related concern was the possibility that admissions tutors might begin to automatically refer candidates to Access Courses if they did not meet the normal entry requirements. While there were some reports of such practices, there were also examples of referrals in the opposite direction, where course tutors had encouraged applicants to

Access Courses to seek direct entry on the basis of their previous learning.

There were also fears that the wider currency offered to students on kitemarked courses might lead to a weakening of guaranteed place arrangements. Here there was evidence of changes taking place: for example, some courses were requiring students to make a clear commitment to taking up the guaranteed place, whereas previously it was more open-ended, with an expectation that a proportion of students would enter other higher education establishments. There were worries among tutors on such courses that higher education institutions would not be disposed to continue these in the future, as they might have less need for special or specific arrangements and they might experience greater difficulty in setting aside places in significant numbers. However, the extent to which this was attributable to the framework was debatable: it was not clear whether it flowed from the increased legitimacy accorded to Access Courses or whether it was a consequence of general pressure on places through greater demand.

The early anxieties surrounding the question of course duration were gradually reduced as AVAs and course tutors appreciated that the 500 hours guideline was able to be interpreted and implemented with 'flexibility'. As a result, there was considerable variation in the way AVAs translated the minimum of 500 hours 'total study time' into private study, project work and contact hours. This has meant that an Access Course validated with 360 hours contact time in one AVA would not be approved in another where 500 hours' contact time was the required minimum. There were a small number of examples where the 500 hours guideline was being used in an attempt to reduce the hours of longer programmes, but this did not appear to be widespread. Although some institutions had built the assessment or accreditation of prior learning (APL) into their Access programmes, there was relatively little consideration by AVAs of APL and advanced standing as a way of offsetting the number of hours required, especially where discrete courses were involved. However, some AVAs – particularly the open college federations and networks – were beginning to develop structures and guidelines, and to agree more formal arrangements in this regard. Some fears remained that the 'norm' of 500 hours had supported a managerial rather than a curriculum-led approach to course design, especially in relation to the construction of new courses and programmes. This was a subtle pressure rather than an overt one, but there was little or no evidence that such fears were borne out in practice.

More recently, the award of a kitemark of national recognition has provided the Department for Education with a means of identifying

and approving Access Courses which qualify for funding under Schedule 2 of the Further and Higher Education Act 1992. While the Act has served to reinforce the division between Access Courses and other types of preparatory provision, the list of courses provisionally approved by the DFE has included not just those kitemarked within the national register and those notified as 'in the pipeline' but also courses 'which fall outside the national framework, where FE colleges have established links with one or more HE institutions' and courses 'where colleges have yet to provide satisfactory evidence for ACRG recognition' (DFE, 1992). However, the admission of courses to the approved list was no guarantee for future funding:

> *'The Secretary of State's decisions will not, however, determine whether a particular college will receive funds in respect of students on a particular course. In the case of an approved qualification or course the Council may decide not to fund, on the basis that their duty to secure adequate provision is discharged by provision in neighbouring institutions. It will be for the Funding Council to decide individual cases' (ibid).*

4.1.3 Other consequences

Bilateral relationships

Apart from the progress made in achieving many of the declared aims of the scheme, there were other, less direct consequences. One of the advantages of having, for the first time, a quality assurance body for Access Courses was the opportunity to engage with other national organisations responsible for accreditation, validation and related activities. These usually involved two kinds of meetings: those concerned with regulatory and relational questions; and those characterised as 'exploratory' and 'liaison' meetings.

With respect to the first category, there were some notable achievements. For example, in the area of nursing, an agreement was reached between the ACRG and the United Kingdom Central Council for Nursing, Midwifery and Health Visiting whereby any recognised Access Course was deemed an appropriate qualification for entry to nurse training. Secondly, in the area of teacher education and after some slow progress, detailed arrangemments were worked out between the ACRG and the Department for Education concerning admission to initial teacher training. Entrants to initial teacher training were required to achieve a standard in mathematics and English language of grade C in GCSE examinations and some Access Courses which prepared mature students for teacher education had incorpor-

ated studies equivalent to GCSE level in these subjects. Following discussions with representatives of the Council for Accreditation of Teacher Education (CATE), the Universities Council for the Education of Teachers (UCET), Her Majesty's Inspectorate and the Department for Education, it was agreed that any recognised Access Course having these components would be accepted as a basis for entry to initial teacher training. In order to validate Access Courses of this kind, AVAs were required to make 'a supplementary agreement' with the ACRG and to ensure appropriate representation from an initial teacher training institution in the validation process. As for entry elsewhere, it was intended that 'judgements made about a particular Access Course by one AVA should be accepted across the system, in all HE institutions' (CVCP and CNAA, 1992b: 14). Initial teacher training institutions currently outside any AVA framework were encouraged, 'through local discussions as well as ACRG's national advocacy', to 'accept the "currency" of judgements made by AVAs and their associated training institutions' (ibid).

The ACRG had also entered into discussions with the Business and Technician Education Council concerning the validation of art and design foundation courses and the distinctions to be made between these courses and Access Courses in art and design. These did not lead to the kind of agreements negotiated for nurse and teacher education and, in the case of dealings with UCCA and PCAS, the ACRG was unable to persuade these bodies to redesign their separate and later their joint application forms to enable students to present and profile information in relation to Access Courses.

Those described as 'exploratory' or 'liaison' meetings were conducted with such bodies as the Open University, the Scottish Wider Access Programme and the National Open College Network. In the case of the first two, these exchanges resulted in one representative from each organisation joining the Specialist Panel. Meetings had also taken place with the Educational Counselling and Credit Transfer Information Service (ECCTIS), the organisation which had published (in co-operation with the CNAA and FAST) the *Access to Higher Education Courses Directory* in 1989 (ECCTIS, 1989) and which was later offered access to the database on Access Courses based at the CNAA. A meeting was also planned with the National Council for Vocational Qualifications to discuss the implications for Access Courses of the introduction of the GNVQ, but this had yet to take place.

Developmental activities

One of the reasons why the CNAA had been considered an appropriate body to develop the framework was its early and growing invol-

vement with providers of Access Courses: either through its validation activities in particular subject fields (such as teacher education) or through its sponsorship of individual development projects (such as those examining dimensions of quality assurance on Access Courses, their role in widening participation in science and technology, their place in wider access networks, and the development of a database for Access Courses). It was to be expected therefore that initial proposals brought to the Steering Committee for the framework envisaged a range of developmental, evaluative and dissemination activities.

These plans were rejected for the same reasons given for not proceeding with a consultation period. A tight schedule and straightforward approach were necessary given the targets to be achieved, the heavy commitments of members, the 'high expectations' of practitioners, and the dangers involved in trying to recommend good practice. Another factor influencing this decision was the establishment of a Staff Development for Access Courses project funded by the DES, based eventually at the Polytechnic of North London, and required to deliver a staff and curriculum development service on a national basis. In parallel with this project, the Forum for Access Studies (FAST) was expected to continue to organise national meetings and local events concerned with the new framework.

The central body, despite its reluctance to take on too heavy a workload, had also committed itself to key dissemination events at a regional level 'to provide more details of the scheme, and to receive the views of Access Course providers and potential validating agencies' (CVCP and CNAA, 1989b: para 33). These were never held, although the lead Secretary and later the other Joint Secretary were active in attending conferences, meetings and workshops for these purposes. Indeed, it was not until the creation of the SCAVA in 1991 that a forum was established for formal communication and professional development to be conducted on behalf of AVAs themselves. While the ACRG did much to encourage the formation of the SCAVA and undertook to support some of its activities in cash and kind, it was the members of this new body which had done most to develop their own staff and institutions and to share that experience with other AVAs.

As was apparent at the first national meeting of representatives of AVAs in March 1991, agencies were at very different stages of development and individuals reflected an uneven range of experience. In some areas, especially where local education authorities were party to an AVA or where development agencies such as the Welsh Access Unit were involved, the level and quality of planned staff and curriculum development was substantial. In other places, it was occa-

sional and incidental. And in relation to some activities, specifically the management and conduct of validation events, training was absent in most if not all AVAs. As in the case of the central body, learning was conducted on the job and was informed by limited information and feedback about developments across the field. It was in this context, especially prior to the arrival of the SCAVA, that AVAs approached the evaluation study for information and clarification about the content of published bulletins, and that meetings convened by the research team were often the first opportunity available to AVAs to compare their procedures and practices. The role of the evaluation study in adopting a collaborative style of working and reporting is outlined in Appendix I.

At both the annual and general meetings organised by the SCAVA since December 1991, a range of developmental issues had been examined, sometimes with an input from representatives from other national bodies (such as the Further Education Unit, the National Council for Vocational Qualifications and the Higher Education Quality Council) but centred usually on workshops led by representatives of the AVAs. These workshops had covered such themes as the relationship of Access Courses to CATS and GNVQs, the impact of modularisation, distance learning and franchised foundation studies, and the translation of AVAs into open college networks. At each of these meetings, the participation of the Joint Secretaries has allowed for more effective communication between the AVAs and the central body than previously. Because only two meetings of the ACRG were held in 1992, and therefore only two opportunities for the SCAVA to have their interests represented through their nominee, this channel of communication has increased rather than decreased in importance in the recent period.

4.1.4 Recurring concerns

Although addressed directly by the central body at an early stage in the development of the framework, two issues in particular were to refuse to go away: firstly, the importance to be attached to equal opportunities in the operation and evaluation of the scheme; and secondly, the need for planning and mediation in the approval of AVAs. Another concern, the financial status and stability of AVAs, has been a more recent source of worry and has influenced 'expectations' about the conduct of periodic review. Unlike the case with the other two, the view that the resourcing of AVAs was outside the remit of the scheme was not disputed or debated during the course of the initiative.

Equal opportunities and performance indicators

The place and profile of equal opportunities in the framework has been a source of argument at different stages in the evolution of the scheme. Within the Steering Committee – or rather the Task Group assigned by that committee to tackle these issues – doubts were expressed by some and more affirmative positions taken by others about whether this dimension should be embraced by the framework. As has been noted, differences turned on the construction of equal opportunities as 'educational' or 'political' and on the appropriate way to 'represent' questions of targeting and positive action.

In the published bulletins, equal opportunities was to be approached through the particular features of Access Courses, especially their ability to 'target' under-represented groups and to demonstrate 'effective links' with the communities they served. The need to explain or evidence the effectiveness of Access Courses in 'promoting equality of opportunity' was identified not as a necessary criterion for validation but as one among a number of 'suggested' issues to be considered. Again, it was not until the third bulletin that the ACRG warned against more instrumental interpretations of the framework and indicated for the first time the groups expected to be targeted: 'for example, social class D and E, and Britain's black and minority ethnic communities'. In considering widening participation as well as increasing numbers, AVAs 'should refer' to their policies and practices 'in the areas of special targeting in recruitment, and the equal opportunities dimension which is a key feature of so many successful Access Courses' (CVCP and CNAA, 1990a: para 39). Somewhat surprisingly, at no point were people with disabilities or special needs identified as a target group or discussed more generally in relation to the framework.

A stronger interpretation of the role of equal opportunities was, however, kept on the agenda by members of the Consultative Committee in their role as members of working parties scrutinising submissions. It was they in particular who pointed to the narrow interpretation of equal opportunities adopted by the central body and the minimal reference to this dimension in some applications. It was they also who alerted the ACRG to the difficulty that body might face, in the absence of formal performance indicators, if ever it wished to assess the extent to which targeting had been applied or achieved. These voices were to be heard as well in discussions about new members to be added to the Consultative Committee, a selection which required 'regard to the need for an appropriate race and gender mix, reflecting the special targeting and equal opportunities dimensions of many Access Courses' (ACRG, October 1989).

The question of equal opportunities has also been revived by the establishment of the SCAVA in their recommendations regarding criteria for periodic review. These extended the interpretation to include the practices and procedures of AVAs as well as the criteria for course validation, and they have since been incorporated into the published guidelines. Equal opportunities were to be addressed 'in their widest sense', covering the structures and procedures of AVAs (including their 'methods of monitoring and evaluating success'), as well as the curriculum design and delivery of the programmes they validated and the targeting and participation of under-represented groups ('allowing for the character of such groups varying from one AVA to another'). However, these criteria were part of a 'checklist' and the use made of these elements would be 'tailored to the circumstances of the AVA being reviewed' (CVCP and CNAA, 1992a: para 12.6.2a).

In accordance with the principles of devolved responsibility and lightness of touch, the central body had not specified what the performance indicators might be in relation to the framework – either for courses or for AVAs in relation to targeting, equal opportunities or any of the other principles and criteria. Nevertheless one of the key principles established at the outset was that Access Courses would have 'appropriate student records and arrangements for monitoring and evaluating the progress and performance of Access Course students on the course and where possible afterwards' (CVCP and CNAA, 1989a: para 25h). While most Access Courses kept such records, there was no commonality in the form and basis for these records: some courses identified students by age, some by gender, some by ethnicity, and some by a combination of these; some provided details of applications, offers, acceptances and withdrawals, as well as achievement and progression. It would appear that a large number of AVAs did not as yet have systems in place requiring course records to be kept in a way which would enable them to be aggregated or used as performance indicators for the achievement of course or AVA objectives.

The publication of the national register has provided a source of performance indicators for the measurement of some of the achievements of the initiative as a whole (such as 'increased availability' and 'wider currency') but it was unable to include information on the profile of the student body or on their performance or progression. This absence of important data has been widely noted and regretted, and it was unlikely to be able to be collected and collated within the existing resources of either the ACRG or many of the AVAs.

Mediations and interventions

The other major issue which surfaced on a number of occasions related to the involvement of the central body in questions of planning. Reference has already been made to the role of the ACRG in sifting the statements of intent from AVAs and encouraging agencies to 'subsume' their bids in favour of consortia rather than single institution models. It was hoped that a 'sensibe' pattern of arrangements would 'emerge', but it was also expected that the ACRG woud act to 'deter' an individual institution from seeking to apply for a franchise when already in membership of an AVA.

Originally, over 60 agencies had indicated their intention to apply for AVA status. Yet by the time of the first round of approvals, only 16 submissions were considered. These had been carefully selected by the central secretariat to take into account the geographical spread and the historical development of agencies as well as different models of operation. Of those first approved and formally announced in January 1990, eight were open college AVAs, six were other types of consortia, and two were single institution AVAs. What was signalled in this selection was not simply the preference for consortia styles but, just as important, the regard for open college models of AVA. The high profile given to open college AVAs came at a critical moment in the development of open college networks and did much to enhance their status and stimulate their growth.

These were early and general examples of the way the central body was able to influence and shape the political geography of AVAs. Later episodes were more public and problematic, with working parties involved more frequently in meetings with applicant AVAs and with visits by officers and members required to deal with difficult cases.

Some of these difficult cases were to do with dual or overlapping membership of AVAs. For example, Birmingham Polytechnic and Birmingham Access Federation both applied for AVA status at the same time, and Birmingham Polytechnic was also a member of BAF. Following a visit by officers and members, an agreement was struck whereby Birmingham Polytechnic would validate only Access Courses located outside the city boundary. The intercession and mediation provided by the ACRG was pivotal in the settlement which was reached.

The 'possible precedent' of the treatment of these two agencies was cited in relation to a more complex boundary question relating to Cheshire Access Federation and its neighbouring AVAs (Manchester Open College Federation in particular). Unlike the siituation in Birmingham, where neither agency had been approved as an AVA, Che-

shire Access Federation was an applicant agency and Manchester Open College Federation was an approved AVA. When considering the submission from Cheshire questions had been raised about whether the development plan proposed by this agency required that Access Courses be 'poached' from other AVAs. For the central body, these 'might be classed as planning issues' but 'ACRG's remit did not extend to such matters': 'There was to be no restriction on the number of AVAs' and 'Competition had a place in relation between AVAs'. On the other hand, 'a sensible pattern of provision was intended' and 'ACRG through its secretariat was involved in giving advice to emergent agencies on ways to cut down duplication and unnecessary expense'. These concerns were 'of a different order from ACRG's experience to date' and posed questions about 'How far could and should a meeting take up the planning issues and competition' between these agencies. In the event, a meeting was convened 'to tease out the implications' and the submission was able to be recommended for approval (ACRG, October 1990).

The other major episode which raised planning issues was the treatment of an applicant agency – the Joint Matriculation Board – which saw itself as a 'national' AVA. The numerous meetings, vists, letters and debates which surrounded this agency were described in an earlier section of this report. The JMB was one of the original bodies which had 'auditioned' for a lead role in developing the framework and it was among the first group of agencies to apply for a franchise. The delay in approval was a function of many factors but one of the planning questions raised during this period was the impact on local AVAs of an agency able and eager to offer validation on a national basis.

4.2 DIRECTIONS AND FUTURES

Consideration of the future role of the ACRG and the shape and direction of the framework had taken place in advance of the publication of the White Papers on higher education and further education in May 1991. These discussions had been prompted by developments in the wider environment for access education as well as by more internal agendas which followed on from a review of the CNAA undertaken by the DES in 1990. The report of the review recommended that a reconstituted CNAA should continue to perform a role as an external scrutiny and central validation body, but this proposal was rejected by the Government in favour of the abolition of the CNAA and the

transfer of its services – including the ACRG – to 'the best future location' for such work (DES, 1991: 28).

Prior to the publication of these White Papers, two possible paths of future development had been explored. One involved a 'consolidation' of the present role of the ACRG and would be devoted to the approval of new or remodelled AVAs, the periodic review of agencies, and the collection and dissemination of information about Access Courses and their students. The other suggested an 'extension' of the remit of the ACRG to embrace a broader canvas of access routes and arrangements in relation to higher education. However, as a result of the formation of the Higher Education Quality Council and the creation of a Division of Credit and Access which would assume responsibility for 'the functions currently being carried out under the aegis of the Access Courses Recognition Group' (ACRG, June 1992), a third possibility was to be contemplated: that based on 'assimilation' of the ACRG into a larger quality assurance organisation set up on behalf of the institutions of higher education themselves – a location with implications for the operation and identity of the ACRG as a discrete body and for an activity dedicated to particular purposes and specific programmes.

Each of these scenarios has commanded support from different individuals and interests at different times and, although events have moved in the direction of the third alternative, they represent sets of arguments which continue to be played out in deliberations about the future of the framework. They are summarised below, both as a record of recent debates and as a basis for tracing subsequent developments.

Consolidation

> *'The ACRG's principal goal, as reflected in the current debate on future development was to establish and promote the "currency" of alternative access to HE, alongside the "gold standard" of A-levels. The price for this must be a system of agreed regulations and rules, by which students' standard and quality were understood and accepted. ... The present work of ACRG and the values systems of Access Courses as currentlly defined must be safeguarded' (Planning Group, March 1991).*

The need for the ACRG to give primary importance to fulfilling the original purposes intended for the framework had attracted considerable support:

- ☐ the approval of AVAs had been based largely on 'trust' that systems were in place or in the process of being instituted: it was important that periodic review ('the nucleus of ACRG's regula-

tory framework') demonstrate the integrity and fitness of AVAs as quality assurance systems in order to communicate confidence in the currency of Access Courses

- ☐ the maintenance of a national register of recognised Access Courses – suitable for users and up-dated on a regular basis – and the development of a national database to support and monitor the scheme remained key objectives if further progress was to be achieved
- ☐ the approval of restructured and reconstituted AVAs and the monitoring of changes and adaptations notified to the central body by existing AVAs might prove to be more important than anticipated. The future funding position of some AVAs was uncertain and the adoption of new forms and styles of accreditation by AVAs was increasingly likely (as evidenced by the number of AVAs which had decided upon open college accreditation following the award of their franchise).

Extension

> *'A diversity of provision and opportunities was available by which mature students might gain admission to HE. For the sake of the students, all these needed protection and promotion. Only some routes had the benefit of general "recognition" ... Other opportunities relied on local discretion ... What exists might be reviewed and documented, so that its quality was seen to be authoritative, and comparable. In essence, why should all this provision be excluded from the concept of "recognition" for entry to HE?' (Planning Group, March 1991).*

The possibility of an enhanced role and new ways of working for the ACRG had been entertained by a number of members, not as a 'new empire to be built' but as 'a logical progression against the existing agenda of wider access to higher education':

- ☐ there existed a range of programmes and arrangements which were currently uncertificated or as yet untouched by existing schemes of national recognition: from foundation, preparatory and conversion courses (some franchised to further education from higher education), through to studies based upon open and distance learning methods and materials, and on to assessments of learning based on previous experience, education and training (including community-based, professionally-related and employer-based programmes)
- ☐ the concepts, principles and mechanisms of credit accumulation and transfer within higher education provided a system of 'credit rating' existing awards and programmes at the level(s) of access

to higher education: articulation agreements with other national bodies offering accreditation at equivalent levels (such as the National Council for Vocational Qualifications and the National Open College Network) might allow for mutual recognition and exchange of credits

- ☐ a developmental role for the ACRG in relation to AVAs had been considered inappropriate during the planning period of the framework but there were clear benefits to be derived at this stage: harnessing the potential of AVAs as 'catalysts for change' providing an effectve means by which to tackle 'institutional blockages'; and working on a joint or collaborative basis 'in the field and around the edges' in order to promote specific activities and disseminate good practice.

Assimilation

The relocation of the activities associated with the ACRG provided an opportunity for some members to question the need for a separate body at all. Rather than consolidation or extension, another interpretation of needs and priorities has pointed to a reduction or even removal of earlier responsibilities:

- ☐ post-binary institutions bearing new titles and corporate missions might not countenance 'a laying on of hands' in the shape of the ACRG (however light in touch) and in the tradition of the CNAA
- ☐ the notion of a single, common or fixed threshold for admission to higher education – as reflected in the focus on access to first degree courses in the framework scheme – had been challenged by arrangements which allowed for different levels, modes and points of entry and a wider range of awards and qualifications (although some higher education institutions would continue to value the kitemark for general matriculation purposes)
- ☐ more uniform and unified frameworks of recognition based on credit transfer, credit accumulation and modularity might prove to be more attractive to autonomous institutions and more effective in enhancing the participation and progression of both young and older students: the Scottish experience of common accreditation, regional consortia and institutional collaboration might be instructive in this respect.

Whatever the purchase of these arguments there was general agreement within the ACRG that some adjustment to the remit of the central body would be necessary 'in the light of experience'. At the same time, there was a concern that the 'essentials', 'fundamentals' and 'values' of Access Courses – notably that expressed through the

principles of targeting and collaboration ('the spirit of Access') – be retained in any new context: both to broaden the 'access dimension' within quality assurance and to emphasise the 'special place' of such programmes in widening and deepening access to higher education.

By the end of 1992 it was clear that the ACRG would be 'stood down'. In November of that year, a consultation paper from the new Higher Education Funding Council confirmed that after April 1993 the ACRG 'will no longer exist and its role will be taken by the Higher Education Quality Council'. More importantly, it proposed that the funding provided to support these activities 'should be reviewed with a view to phasing it out as soon as is practical' (Higher Education Funding Council, 1992: 7). In December, the Assistant Director responsible for access in the Higher Education Quality Council (formerly one of the Joint Secretaries to the ACRG) had informed AVAs preparing for periodic review in 1993 that the locus of authority for the recognition of Access Courses was likely to be assigned to the 'advisory group' for credit and access within the HEQC, chaired by Professor Peter Toyne (formerly Chair of the ACRG). The 'Specialist Panel' was expected to continue to support the new arrangements and it was anticipated that the SCAVA would play a 'key role' in the maintenance and development of the national framework.

Note

1. The distinction between foundation years, access courses and 'twin-track' access courses, and the development of franchising and semester organisation, was the subject of 'further advice' from the DFE in August 1992 to institutions of higher education and local education authorities (DFE, 1992b).

appendix i

Origins, Methods and Outcomes

The origin of the present study was an invitation from the Access Courses Recognition Group for proposals to be brought forward for the 'monitoring and evaluation' of the early phase of operations of the national framework. The original Steering Committee for the scheme had recommended that arrangements should be made for monitoring and evaluation but it had argued against 'pilot exercises' which might delay the launch of the initiative as well as proposals which drew too heavily on the limited resources available to the central body. At this stage, a distinction was suggested between an evaluation study aimed mainly at the central body and a more ambitious investigation of the work of individual validating agencies, 'with related development and support to them' (ACRG, June 1989).

The outline put forward by one of the authors proposed an independent evaluation study based at City University and conducted in collaboration with the central body and with selected AVAs. In order to extend the scope of the work – as an academic study as well as an evaluative exercise and as a record of the implementation of the framework as well as its formation – four external funding bodies were approached to support the study. Up to this point, one of the researchers (Gareth Parry) had been a member of the Consultative Committee which had considered the first batch of submissions for AVA status in September and October 1989. The second researcher (Pat Davies) had completed a CNAA Development Fund project on dimensions of quality assurance on Access Courses and had presented the findings to the Steering Committee for the framework in October 1988.

Following approval of the research proposal by the ACRG and an agreement that the researchers would have full access to the meetings and records of the central body, the evaluation study commenced in

January 1990. A Steering Committee for the work was also established (Appendix IV), which included representatives of the four funding agencies (Training Agency, DES, FEU and UDACE), the ACRG and other members drawn from further education and higher education and from an AVA. The Joint Secretaries of the ACRG were also invited to attend. In order to affirm the independence of the study and to avoid any confusion about ownership of the work it was agreed that the interim and final reports of the evaluation study would be presented (and published) on behalf of the Steering Committee.

The study was conducted in two parts. The first part, carried out between January 1990 and August 1990, focused on the formation and operation of the framework at national level, including the early rounds of AVA approvals. During this period, all papers relating to meetings of the Convening Group, Steering Committee, Task Group, ACRG and Consultative Committee were consulted, along with other documents and correspondence. Interviews were also conducted with members of the central body and with representatives of a number of AVAs.

The second part of the study, from September 1990 to August 1991, was mainly concerned with the implementation of the framework at local and regional level and was based on fieldwork undertaken in different parts of England. The main locations for fieldwork were five newly designated AVAs: Access to Learning for Adults (ALFA); Birmingham Access Federation (BAF); Manchester Open College Federation (MOCF); Newcastle Polytechnic and Partners (Newcastle); and South West Access Validating Agency (SWAVA). These were chosen to represent a geographical spread of activity, different models and contexts of AVA, and different styles of Access provision. All were drawn from the first round of submissions to the ACRG in order that the maximum time in operation could be included in the study. The fieldwork included: attendance at management committees, validation committees and panels, and staff development events; interviews with staff at various levels in member institutions or organisations; and examination of course submissions, panel reports, committee minutes, examiner reports and other documents. A number of other AVAs – Black Country Access Federation, South Yorkshire Access Federation, North and East London Access Federation, Essex Access Consortium and Hertfordshire Access Consortium – were also involved through regular meetings with the case study AVAs convened by the researchers.

Throughout the whole of the study the researchers attended all meetings of the ACRG and its committees, working parties and other groups. This included the series of 'regulatory' meetings held with

other national bodies concerned with validation and accreditation (such as CATE, UCET, DES and Her Majesty's Inspectorate in the field of teacher education), and the more occasional 'liaison' meetings with interested national groups (such as the Scottish Wider Access Programme and the National Open College Network). One researcher was also usually invited to accompany the visiting parties of ACRG officers and members which were sometimes used to deal with difficult submissions. In addition, the research team was able to attend the meetings and working parties which preceded the launch of the SCAVA. The only formal meetings closed to the researchers were those of the Convening Group. In fact, this group met only once during the period of the research. Finally, because the research team continued to receive the papers of the ACRG during 1992 as well as attending assorted framework meetings and events during this period, the final report of the evaluation study was able to take in both the rise and the demise of the ACRG.

The study was intended to have three dimensions or purposes: academic, evaluative and developmental. In academic terms, the study has provided a detailed narrative account of the actions, interests and assumptions informing the formation and implementation of the national framework at national, regional and local levels. A more historically-based and theoretically-informed treatment of this policy episode will be developed in subsequent papers which draw on this account. The evaluative dimension was operated in two frames: firstly, formative evaluation or regular feedback to those who agreed to collaborate in the study – the central body and the case study AVAs; and secondly, and more problematic, some kind of summative evaluation tracing the extent to which particular goals and objectives had been approached or achieved by the end of the study. Rather than attempt an audit of framework activity, the final section of the report is written as a concluding commentary, emphasising that the conditions which shaped the formation of the scheme were rather different from those which surrounded its implementation. The developmental component in the work was linked to the academic and evaluative elements in the research design, and was meant to make available, at different stages and to different audiences, data and analysis which might guide the development of policy (and practice) in this complex field.

At national level, the impact of formative evaluation was probably best demonstrated through the dissemination of the interim report. This report, *Framing Access*, was published by UDACE and distributed to all members of the ACRG and the Consultative Committee and to all the AVAs. Prior to publication, the report was

presented to a joint meeting of the ACRG and the Consultative Committee, and contributed to a shift in the way the central body operated at that time: away from a reliance on published bulletins as the main means of communication with AVAs and course providers, and towards a more consultative mode based on networking with and between AVAs. There was also a movement in favour of more meetings with applicant AVAs as part of the approval process, and an attempt to deal with inconsistencies in the way submissions had been handled. More subtle was the way progress reports to the Steering Committee for the study, and regular feedback to the Joint Secretary based at the CNAA, worked their way into the agendas and discussions of the ACRG. As part of more general dissemination, the research team attended workshops, seminars and conferences across the country to report preliminary findings and to invite individuals and organisations to comment on any aspect of the scheme. An open invitation to comment in confidence was circulated widely and was included in the interim report, but very few responses were received.

In respect of the case study and other associated AVAs, the developmental impact was also significant. The most tangible expression of this dimension was the provision of a written and an oral report to each case study AVA, describing the operation of the agency, commenting on its policies and practices, and contributing to self-evaluation and annual review within the AVA. The other obvious source of ongoing evaluation and development was a result of the collaborative style of working agreed and conducted between the research team and the participating AVAs. Unlike their attendance at meetings of the central body where they were formally identified as 'observers', in the fieldwork with AVAs the research team chose not to be passive or silent observers but to participate in whatever ways and to whatever extent might be appropriate to the AVA. This helped to build mutual trust and confidence in the research, enabled the researchers to contribute directly to the development of practices and procedures across the AVA, and allowed for full and frank feedback to be given to AVAs at the end of the fieldwork. Arguably, it also yielded a richer source of data than might otherwise have been possible.

Just as important as the interactions and exchanges between the research team and the AVA were the informal meetings of case study and other AVAs convened by the researchers to note, share and review experience. At this time, prior to the creation of the SCAVA, there were no mechanisms for AVAs to meet in this way and these meetings served a wide variety of purposes. For the AVAs they provided a forum for discussion (and clarification), an early oppor-

tunity for comparison, a channel of communication (to the central body) and a means of support (and sometimes reassurance). For the research team they acted as a sounding board for ideas which had emerged in the research as well as a guide to perceptions and experiences in the field.

There was one area which the present study was unable to examine because of the timetable adopted for the research. This related to the impact of the framework in those localities and regions where few Access programmes and little or no arrangements for validation or collaboration had existed previously. By the time AVAs began to be approved in and around these territories it was too late for the evaluation study to monitor these developments in any detail. Furthermore, delays on the ground in putting a large number of Access Courses through validation procedures and shortcomings at all levels in the collection of data about students and programmes has meant that it was not possible to provide more quantitative data on the impact of the scheme.

appendix ii

Chronology of Events 1987–92

1987		
April		White Paper on *Higher Education: Meeting the challenge*
November		FAST Conference on *Access Courses: the role of the validating bodies*
		DES invitation to the CNAA to take the lead in developing the framework
1988		
January	First meeting of the Convening ('Athenaeum') Group	
June	First meeting of the Steering Committee	
July		Education Reform Act
September	First meeting of the Task Group	
October	Second meeting of the Steering Committee	
November	Second meeting of the Task Group	
	Third meeting of the Steering Committee	

1989		
February	Second meeting of the Convening Group	Publication by the CVCP and the CNAA of *Access Courses to Higher Education: A Framework of national arrangements for recognition*
March	Fourth meeting of the Steering Committee	
April		Invitation from the Secretary of State to the CVCP and the CNAA to establish a central body to administer the framework
		Publication by the CVCP and the CNAA of *Access Courses to Higher Education: A Framework of national arrangements for recognition (2). Procedures for the approval of Authorised Validating Agencies and an invitation to apply*
June	First meeting of the ACRG	Publication of the HMI report on *The Widening of Access to Higher Education*
September	First joint meeting of the ACRG and the Consultative Committee	
October	Second meeting of the ACRG	
November		Announcement of a Review by the DES of the CNAA
December		Publication by ECCTIS (in cooperation with the CNAA and FAST) of *Access to Higher Education Courses Directory*
1990		
January	Third meeting of the ACRG	Commencement of the Evaluation Study
		Announcement of the approval of the first 16 AVAs

February	Second joint meeting of the ACRG and the Consultative Committee Fourth meeting of the ACRG	Publication by the CVCP and the CNAA of *Access Courses to Higher Education: A Framework of national arrangements for recognition (3). Progress report from the Access Courses Recognition Group*
April	Fifth meeting of the ACRG	
June	Sixth meeting of the ACRG	Publication of the HMI report on *Access Courses to Higher Education* Publication by the DES of the *Report of the Review of the Council for National Academic Awards*
October	Third joint meeting of the ACRG and the Consultative Committee. Presentation of the draft Interim Report of the Evaluation Study Seventh Meeting of the ACRG	
November	Liaison meeting between representatives of the ACRG and the National Open Colleges Network	Publication by the CVCP and the CNAA of *Access Courses to Higher Education: A Framework of national arrangements for recognition (4). The Access Courses Recognition Group: advice and progress report*
1991		
January	Eighth meeting of the ACRG	
March	National meeting of AVAs ('SCAVA') Meeting of Planning Group of the ACRG Fourth joint meeting of the ACRG and Consultative Committee Ninth meeting of the ACRG	

May	Meeting of Working Group of the SCAVA Meeting of the SCAVA Task Groups Follow-up National Meeting of AVAs	White Papers on *Higher Education: A new framework* and *Education and Training for the 21st century*
June	Tenth meeting of the ACRG	Publication by UDACE of *Framing Access: The Interim Report of the Evaluation Study of the National Framework for the Recognition of Access Courses*
July	Third meeting of the Convening Group	
August		Conclusion of the Evaluation Study
September	Meeting of Working Group of the SCAVA	
October	Eleventh meeting of the ACRG	Joint submission to the DES by the CDP, CVCP and SCOP on the establishment of a new quality assurance and access organisation
December	Launch and Annual General Meeting of the SCAVA	
1992		
February	Joint meeting of the ACRG and the Specialist Panel Presentation of the draft Summary Report of the Evaluation Study Twelfth Meeting of the ACRG	
March	General meeting of the SCAVA: Implications of the Further and Higher Education Act	Further and Higher Education Act
April	Meeting of Co-ordinating Group of the SCAVA Periodic Review of South West Access Validating Agency (SWAVA)	ACRG Circular on *A Framework for Periodic Review of Authorised Validating Agencies (AVAs)*

June	General meeting of the SCAVA: Exploring the 'Frontiers' of Access Courses Periodic Review of Coventry Polytechnic/University of Warwick/FAME JRRSG Thirteenth meeting of the ACRG	
August		DFE circular letter on approval for Schedule 2 status of vocational qualifications and Access Courses under the Further and Higher Education Act 1992 DFE circular on developments in course provision: access courses, foundation years, franchising and semester organisation
September		Publication by the CVCP and the CNAA of *Access Curses to Higher Education: A consolidated bulletin on the framework of national arrangements for the recognition of Access Courses in England, Wales and Northern Ireland* Publication by the CVCP and the CNAA of *Register of Recognised Access Courses to Higher Education: Access Courses to Higher Education Framework of National Arrangements for Recognition*
October	Periodic Review of the Open College of the North West	
November	Periodic Review of the North and East London Access Federation (NELAF)	
December	Periodic Review of the Bedfordshire Access Consortium Annual meeting of the SCAVA	

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appendix iii

Case Study AVAs

This appendix contains brief outlines of the five case study AVAs in alphabetical order: Access to Learning for Adults (ALFA), Birmingham Access Federation (BAF), Manchester Open College Federation (MOCF), Newcastle Polytechnic and Partners (Newcastle), and South West Access Validating Agency (SWAVA). The information provided relates to the situation as observed in the middle part of 1991. Even during the short period of the fieldwork conducted between September 1990 and August 1991, AVAs were constantly modifying their practices and procedures in response to the demands of the immediate situation. In particular, the funding position of each AVA was likely to have changed and should not be seen therefore as reflecting recent circumstances and arrangements. However, the main features of an AVA would remain intact until changes had been approved by the central body, and at the time of writing no major revisions had been submitted other than the merging of the four London open college networks into one AVA, the London Open College Federation.

The five case studies have been a key source of evaluative data for the final report. They are referred to at numerous points in the text to illustrate particular themes or evidence certain patterns, and they constitute the bulk of the empirical material discussed in section three of the report. What follows is an outline of the structures, procedures and practices of the AVAs in order that the information in the main text can be set in a more detailed context. The descriptions are provided under a common set of headings: background; purposes and functions; structure; funding; what is a course?; assessment; external moderators and external examiners; review of AVA procedures.

ACCESS TO LEARNING FOR ADULTS (ALFA)

Background

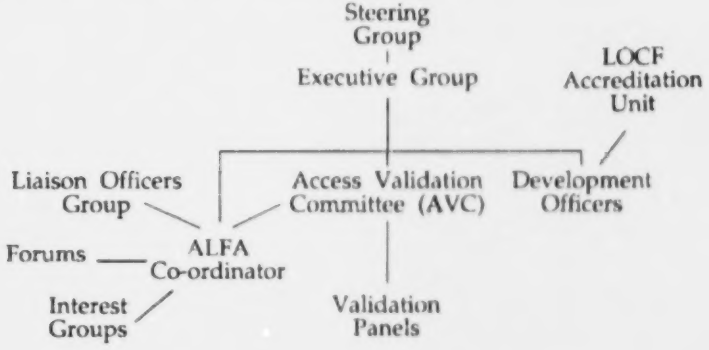
ALFA was the name given to the open college of north and east London and it had operated since 1983 as a local network for curriculum and staff development, marketing of access programmes, research and development projects, dissemination of information, and general guidance services to mature students. It did not undertake accreditation and validation activities until its approval by the ACRG as an AVA. The submission to the ACRG was made in July 1989 and was approved in January 1990. It was one of the few applications in the first round to be approved without reference back for further information or clarification.

Purposes and functions

The new functions of validation, moderation, review and associated support and staff development activities were added to the existing range of activities and integrated where possible. In addition, ALFA joined with the three other open colleges in London to form the London Open College Federation (LOCF) for the purposes of accreditation of Access and other courses.

Structure and funding

The membership consisted of all higher education (two polytechnics, one university and one college of the University of London), further education (four colleges) and adult education (three) institutions, a community education centre, the education advice services (three) and the careers service in the local authorities making up that quadrant of the Inner London Education Authority.



The Steering Group met termly to agree policy and oversee the work of all committees. It consisted of senior management representatives of all member organisations and, ex-officio, the Head of the LOCF Accreditation Unit. Between meetings its authority was delegated to the chair and an executive group consisting of one higher education, one further education and one adult education member.

The Access Validation Committee (AVC) consisted of a representative (at head of department level) from each of the four higher education institutions and the four further education colleges, two additional members representing adult education/further education links and further education/higher education links, the ALFA Co-ordinator as secretary and, ex-officio, the Validation Officer of LOCF. It met four times a year: once a term to consider reports from validation panels and once to review procedures. In the first year it met on two additional occasions to deal with the large number of courses which applied for validation and accreditation. It had responsiblity for the processing of applications for validation from first contact to final approval. The ALFA Co-ordinator acted as secretary and the administrative functions of the committee were delegated to him. Scrutiny of all panel reports and detailed monitoring of activities was carried out in the committee.

Each member institution appointed a Liaison Officer, with remission, to promote, co-ordinate and disseminate the activities of ALFA within their institution and to provide feedback on practitioner issues to the open college. The Liaison Officers Group met monthly until March 1991.

Forums were staff development events, open to all staff in all member institutions, held once a term and dealing with a range of curriculum and other issues (for example, credits and levels, framework developments, youth access, and anti-racism in the access curriculum).

Prior to March 1990, ALFA was funded by the ILEA and from April 1990 by the three London boroughs of Hackney, Islington and Tower Hamlets. For the financial year 1990–91, each contributed £15–18,000 (with an additional £20,000 each to LOCF); for the financial year 1991–92 each contributed £8000, and in March 1992 funding ceased. The three local authorities subsequently agreed to 'buy in' to LOCF services at the rate of £15,000 each, for which they received a package of services including consultancy, development work, accreditation and validation of Access to higher education programmes, negotiated on costings of each activity, according to their needs.

Changes in the financial support available to ALFA and the other

inner London AVAs resulted in the amalgamation of the four London open colleges into LOCF, a single AVA for inner London which received approval from the ACRG in June 1991. The structure remained similar, with four AVCs (one for each of the previously separate AVAs) established to maintain local decision-making.

What is a course?

All the programmes submitted to ALFA were discrete Access Courses; there were no large modular schemes. Although many of the courses were built on modules, they were agreed packages of modules for clearly defined groups of students. Based on the minimum requirement of 500 study hours, all courses consisted of at least 16 credits. Originally these had to be at level four although this was subsequently changed to be at least 12 at level four. Many programmes consisted of many more credits, sometimes as many as 44. On all courses students were awarded a kitemarked certificate if they achieved a minimum of 16 credits at level four (or in the case of BEd programmes, at least 12 at level four and six or eight at level three in mathematics). At validation panels, course teams were asked to specify which 16 credits these should be, particularly in large programmes. Guaranteed place arrangements often occasioned further requirements of additional or specific credits.

Assessment

There was considerable standardisation between courses in the way credits were allocated and awarded, as all existing and new courses had moved to a credit-based system at the same time, and were supported by Development Officers working with one format. Individual credits were attached to a specific assignment or unit of study consisting of a small number of assignments. It was unusual to award more than one credit at a time, and for each credit and type of assignment the criteria were clearly set out in detail in the course document. Most credits were available at level three and four (and sometimes two) so that students could develop at different rates in different subject areas. All but one course had abandoned percentages or grades in the assessment of coursework and examinations and worked entirely with the criteria and levels of credit. The exception was a university-based course which maintained a percentage system alongside the credit system in order to retain university certification as well as open college accreditation.

External moderators and external examiners

There was one external moderator per course who combined the functions of the external examiner and moderator as defined by the ACRG. They were drawn from a range of backgrounds: a university Pro-Vice Chancellor from outside the consortium, a head of a local sixth-form centre, a lecturer from a polytechnic within the consortium, a director of a theatre company, a principal lecturer in law at the Inns of Court, a Head of Quality Assurance at the Further Education Learning Quality Unit, a senior lecturer at a tertiary college outside the consortium, and the Co-ordinator for the consortium. They were expected to moderate up to two other Access courses if possible 'in order to harmonise standards between courses'. Most did moderate other courses, although not always within the same consortium. There was also a plan to bring course tutors and teams together with moderators into a consortium, although this had not happened, as many courses were still going through initial validation. Moderators were employed and paid by the open college and were expected to attend a training event once a year.

Review of AVA procedures

A special meeting of the Access Validation Committee took place at the end of each year to review procedures and to monitor the way in which the criteria for the appointment of moderators and panel members, and the criteria for course approval, had been implemented. In order to do this they drew on their own experience of validation processes and practices, on panel reports, and on reports from the Development Officers. The Development Officers in turn drew on their own experience as key participants, on evaluation reports from tutors of the moderation process, and on evaluation reports from all validation panel members.

BIRMINGHAM ACCESS FEDERATION (BAF)

Background

BAF officially came into being in June 1989 after a two-year period of development during which a Development Officer was appointed by the local education authority. It was approved as an AVA in April 1990.

Purposes and functions

The AVA had nine objectives set out in its constitution:

1 Establish BAF

2 Recognise existing courses and 'encourage the movement towards consistency in hours of study, attendance, levels of achievement, monitoring and evaluation, subject content, etc.'

3 'Guide, support and oversee the planning and development of all new provision, and finally approve and validate it'

4 'Promote the development of Access routes' ... 'in order to encourage the continuing orderly growth of such courses'

5 'Advocacy role on behalf of its students by informing admissions tutors and persuading them of the integrity and value of the Federation's certificate'

6 Promote and market Access opportunities

7 'Encourage the development of appropriate educational guidance within the City ...'

8 'Ensure the development of pre-Access modules ...'

9 'Collect and collate information about unmet educational needs of adults and encourage providers to develop the strategies ...'.

In addition, the AVA intended to offer staff training and support.

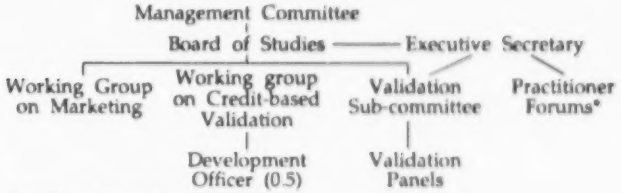
Objectives 1 and 2 were given priority and took longer than expected – hence there was little or no progress on the other objectives until the end of the spring term 1991. At that time working parties on marketing and credit-based validation (of pre-Access provision) were set up. Staff development was left to the colleges and the pattern of activity was therefore patchy. No survey of unmet needs or promotion of new courses or of 'orderly growth' took place although new courses were developed. As one member of the AVA pointed out, 'we have no power to instruct and therefore can't have a strategic role'. BAF did not formally take on an advocacy role with admissions tutors, although higher education representatives on the Board of Studies tended to see it as part of their role to do this in their own institutions.

Structure and funding

The structure developed during the first year of approval as an AVA and continued to do so.

The Board of Studies met approximately once a month and comprised: a head of a college of further education as chair, a former member of a university and the Joint Matriculation Board as vice-chair, the Executive Secretary, one representative from each of the four

higher education institutions, the Access Co-ordinator from each of the eight further education colleges, and one representative from: the Open University, an adult residential college, adult education, and the office of the Chief Education Officer.



* Practitioner Forums began in 1991-92

The Management Committee membership was similar, with the addition of two elected councillors as chair and vice-chair, a representative of the Library Service, the Adviser for Multi-cultural Education, two additional representatives from adult education, and one from the Workers' Educational Association and the Trades Union Congress. In addition from September 1991 there was a representative from the local Training and Enterprise Council and from the Black Country Access Federation (BCAF).

The Validation Sub-committee was chaired by the vice-chair of the Board of Studies and had three higher education, three further education and one adult education member, together with the Executive Secretary.

The AVA was funded for the most part by the local education authority. The full-time Executive Officer was employed by the local authority and paid through one of the colleges of further education which also provided, on a goodwill basis, the office accommodation, equipment and services. Accommodation for committee meetings was provided by the member institutions on a rotating basis, and validation panels were held at one of the providing colleges. For the financial year 1991–2, the local authority was also funding a 0.5 secondment for a development worker for credit-based validation, a full-time clerical worker and approximately £8,500 for marketing and publicity. There were no membership fees and no charges to providers for validation (although there was an expectation of charges to providers outside the city boundaries in the future). The fees for moderators and external examiners were set by the AVA and paid by the providers. Home Office Section 11 funding underpinned much of the provision in the city and supported some of the remission for college Access Co-ordinators to attend meetings.

What is a course?

BAF validated only Access Courses and clearly defined packages of modules which provided a preparation for degree study. Access to HND programmes were excluded from kitemarking arrangements. Courses were required to be full-time for at least one year, including at least 500 contact hours, or part-time over two years including at least 400 contact hours. In the first year of operation as an AVA common modules in mathematics were developed which were separately validated and subsequently available for inclusion in the submission of different Access Courses.

Assessment

All courses were required to award at least 40 per cent of the total marks on the basis of written examinations, to include the assessment of practical work and coursework, and to use a common framework for overall marks. The results for individual students were submitted to the AVA in four grades: pass with merit (60 per cent-plus overall), pass (40 per cent-plus overall), referral, fail. Kitemarked certificates were awarded to students who passed or passed with merit. At validation panels, the types of assessment were examined as well as the way in which marks were aggregated, but there was not always discussion about marking criteria or anticipated learning outcomes. Comparable standards in the award of marks were for the external examiners and moderators.

External moderators and external examiners

The model agreed for BAF by the ACRG was an external moderator for each providing college, responsible for all the courses in the institution. The moderators could be from further education or higher education, and if a college had more than four courses there was provision for more than one moderator. Moderators were responsible for ensuring that standards of the course were maintained by monitoring the level of resources available, advising the course team, consulting with the students and contributing to course review. In addition, there was an external examiner for each subject area to work across the AVA for all courses in that subject. The external examiners were responsible for the scrutiny of proposed examination questions and for examining scripts and the other work of students at the end of the final year. They sat on the examination board and decisions about the awards to students were made on the basis of their recommendations. This dual cross-AVA system was not fully in place – a whole variety of different arrangements existed reflecting historical

patterns. Plans were in hand to move to the new system with effect from the beginning of the academic year 1991–92.

Review of AVA procedures

A new Executive Secretary was appointed at the start of the 1990–91 academic year, following the illness of the previous officer. The AVA had therefore made little progress on implementing the agreement it had made with the ACRG and there was considerable confusion about what had been agreed within the AVA. In order to address this problem, the new Executive Secretary conducted in effect a complete review of all the terms of reference, guidelines for documentation, validation procedures and the implementation of the criteria for course approval. A further review was expected when the revised procedures were fully operational.

MANCHESTER OPEN COLLEGE FEDERATION (MOCF)

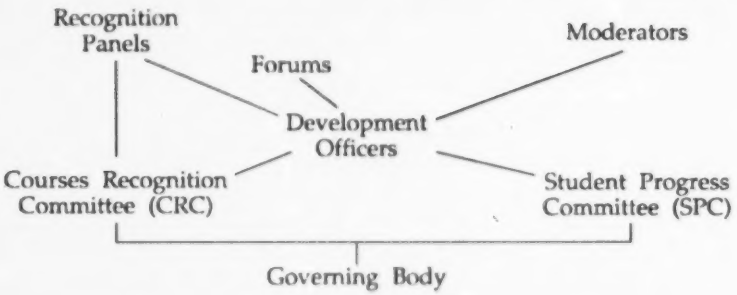
Background

MOCF was initiated in 1981 and had considerable experience as an accreditation body, having accredited some one thousand courses at various levels by the time of its submission to the ACRG in August 1989.

Purposes and functions

MOCF did not set out its aims and objectives in the submission to the ACRG but described its activities and structures: it was an accreditation body providing processes and procedures of quality assurance, the monitoring and guidance of student progress, and promoting pathways of learning into, through and beyond the MOCF framework. Both the structure and remit derived in large part from the commitment to a particular style of working: 'consultative', 'collaborative, peer group activities' and 'development work'. The open college therefore had a broad remit for accreditation of work at levels from basic literacy and numeracy to access to higher education programmes, in a variety of learning settings; for research and development at local and national level; staff development for a range of organisations; consultancy work; and various supporting activities. The AVA was deliberately embedded in the open college structure rather than separate from it.

Structure and funding



The Governing Body consisted of two members of Manchester Education Committee and senior managers from member organisations: two from each of the higher education institutions and one from each of the further education colleges, sixth-form colleges and community education organisations, one from each of the North-West Regional Advisory Council, the Workers' Educational Association, the National Association of Teachers in Further and Higher Education, and the extra-mural department of a university, and 10 co-optees representing other interests (minority groups, community service, industry, commerce, National Union of Students). It met once a term and was responsible for the general direction of the federation and oversight of the work of the committees, reporting to the local education authority.

The Courses Recognition Committee (CRC) met once a term and was responsible to the Governing Body for: 'the creation and management of an effective system of course recognition based upon agreed principles' and the 'production of an agreed set of criteria for the award of credits for the successful completion of courses of study'. The committee delegated the work of recognition to panels and received reports of their work from the Development Officers; it did not deal directly with courses or panel reports. Similarly, it received reports from the Development Officers on moderation and the award of credits. At the end of 1990–91, committee members assisted the Development Officers in the scrutiny of moderation reports as part of the supervision and review of activities.

The Student Progress Committee (SPC) also met once a term and reported to the Governing Body. It was responsible for the creation and management of an effective system for reporting on student

progress and information, and for advice and assistance to those students seeking admission to higher education courses.

Both the CRC and the SPC had one representative from each of the providing and receiving institutions, at head of department/college co-ordinator level and course tutor level respectively.

The Forums represented various tutor interest groups (for example, women's studies, access to higher education) and provided practitioners with opportunities to debate issues and developments in their field. For example, the access to higher education group was the location for much of the discussion regarding the MOCF submission to the ACRG and the new system of programme moderation.

Originally funded by Manchester City Council, the local education authority subsequently decided that MOCF should be self-financing by the end of the 1991–92 financial year. Although fees had been charged to outside organisations, they were introduced for the first time to members in the city in 1990-91. In that year (1991–92 is shown in brackets on the basis of the new credits of 30 hours rather than 50 hours as previously) the fee for recognition of a programme was £60 per credit (£40 per new credit), with a minimum of £120 (£120) and a maximum of £600 (£680), payable on completion of the recognition panel and after re-accreditation every five years. In addition, there was an annual registration, moderation and review fee which for large multi-course programmes was £6 per credit per student (£4 per new credit), with a minimum of £675 (£680) per programme and a maximum of £60 (£68) per student. In respect of both fees, the maximum figure applied to large programmes of 10 credits or more (16 or more new credits); in other words, all Access to higher education programmes. The fee included the necessary support and development work by Development Officers.

In addition to fee income, MOCF had accommodation free of charge from a polytechnic member although it paid its own overheads (including telephone and photocopying).

What is a course?

After some discussion with the ACRG, MOCF 'noted the ACRG recommendation that in any course programme there should be a minimum of 8 credits at level 4'. These were 'old' 50-hour credits and therefore became 12 'new' 30-hour credits. There was also an assumption that programmes would also generally include some credits at level three. Prior to the introduction of thhe national framework, MOCF was for the most part involved in validating packages of courses or units (normally called a programme) and the notion of successful completion of a programme was not important as students

acquired credits from the programme according to their needs and negotiated entry to higher education through the network of informal local links. The national framework meant that a decision was required about whether students should be awarded a kitemarked certificate in addition to the credits and guidelines for each programme. This was done by detailed work on three cohorts of students in the first year of operation as an AVA, to develop guidelines for defining successful completion and for formalising the assessment of prior learning.

Assessment

The AVA did not prescribe assessment methods for programmes. It did, however, require course submissions to identify the criteria for the award of credits and to explain how students would demonstrate that they had achieved those criteria. It did not prescribe internal marking arrangements, although these were for the moderator to examine and comment on in reports where appropriate. A wide range of different assessment arrangements existed. There were different proportions for examinations and coursework: only one programme had no examinations and in some they counted as 60 per cent of the overall assessment. It was clear from the fieldwork that internally some courses marked work on the basis of a percentage while some gave comments but no mark other than pass/refer. In one case tutors awarded a percentage for their own purposes but gave the student a pass/refer only. In some cases the system of credits was integrated into the internal marking system, while in others it was a bolt-on mechanism to a more traditional assessment programme. In some cases credits were attached to specific assignments; in others, several credits were awarded at the end of a unit or module for all the work completed. The latter was designed to overcome the problem, at the beginning of the programme, that students would probably not perform up to level four immediately. This arrangement allowed for a gradual build-up to this level or for the student to perform less well in one piece of work but not be disproportionately penalised. Other programmes addressed this issue by setting the early assessments at level three and later ones at level four. The AVA principle underlying this diversity was that 'assessment works best when the tutors are comfortable', while at the same time providing 'a framework for change and development through the processes of accreditation, moderation and practitioner forums'.

External moderators and external examiners

Access programmes were made up of a number of subject courses with a moderator for each course, who combined the functions of external examiner and external moderator, as defined by the ACRG. This individual was also moderator for other courses in the same subject area, albeit with different curricula, and these formed a consortium. In addition to visiting each course separately, the moderator was the convenor of the moderation consortium; in other words, a group of courses in the same or similar subject area. The tutors in the consortium met once during the course to moderate marks and agree the levels and credits being awarded across the different courses. In addition, for the multi-course Access programmes, one of the moderators was to act as the programme moderator to examine and report on the whole programme with regard to issues such as coherence, student support, management, guidance and counselling, entry procedures and so on and to approve the award of a kitemarked certificate.

The system of programme moderators was new: a pilot phase with three programme moderators was undertaken in the first year, before adopting the model on all Access to higher education programmes where possible in the following year. At the same time, a number of other arrangements existed since not all courses were in consortia. In some cases a course was 'unique' and so moderation was a one-to-one activity between the tutor and the moderator. In other cases there was a mixture of arrangements; for example, in one programme the core elements – English, mathematics and computer studies – were in a consortium and the other elements of the programme – social studies; economics, history and European studies – were the responsibility of one moderator. In another example, the programme had a large number of students so that several tutors taught each unit and in effect constituted a consortium in their own right so that much of the comparative work went on internally with one moderator for the whole programme. Most of the arrangements for moderation were historical; most of the programmes had been running for several years. It was planned to bring them closer to the general model where possible as they came up for review.

Review of AVA procedures

There were no formal annual evaluation events but self-evaluation was built into the structure and most of the procedures. For example, the Courses Recogniton Committee had a special meeting at the beginning of the academic year to review both the participation of

members and the effectiveness of the committee; membership of all the committees was renewed; training events for moderators and evaluation reports from tutors were used to gain feedback on the moderation process; and the Forums were used to gain feedback from practitioners on any issues arising from their experience of moderation. In addition, there was a major updating and revision of the record-keeping system in preparation for the change from a 50-hour to a 30-hour credit. The only part of the system not to have undergone a review during the first year as an AVA was the operation of the accreditation panels.

NEWCASTLE POLYTECHNIC AND PARTNERS (NEWCASTLE)

Background

The AVA grew out of the Higher Education Foundation Course (HEFC) developed by the polytechnic which began with one college offering three modules in 1981 and by 1991 involved nine institutions, including a community school, offering 20 different modules. The remit of the AVA as approved by the ACRG related only to that modular scheme, although proposals were in hand to extend this to include other forms of Access provision, such as free-standing Access Courses and Youth Access programmes.

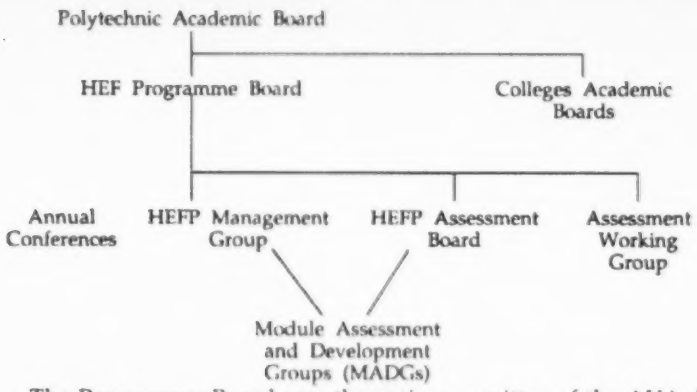
Puposes and functions

The key functions of the AVA were:

- ☐ the management and validation of the modular scheme
- ☐ a clear commitment to the development of credit accumulation and transfer (CAT) and arrangements for the accreditation of prior learning
- ☐ the promotion of the HEFC programme with polytechnic admissions tutors
- ☐ related staff development activities. .

Structure and funding

There was an annual conference for admissions tutors in which the AVA and the colleges participated and an annual conference of the Higher Education Foundation Programme (HEFP) for all those involved in the scheme in colleges and the polytechnic, although the latter did not take place in 1990–91.



The Programme Board was the main committee of the AVA. It met once a term and was chaired by the Head of Polylink (the department responsible for all access, CAT, and external liaison activities). It consisted of the Co-ordinator from each of the providing institutions (one of whom was vice-chair), the polytechnic Access Co-ordinator, all the polytechnic moderators, a college tutor representing each of the modules, up to three external co-optees and one representative from each of the higher education institutions in the region which recognised the programme. This committee was responsible for the approval of new providing institutions and of the content and assessment regulations of existing and proposed modules (in other words, the validation process), the development of credit accumulation and transfer and the periodic review of the programme.

The Management Group met once a month in term time and consisted of the polytechnic Access Co-ordinator and the Co-ordinators from each of the providing institutions. It was responsible for the effective operation of the programme and referring mattters of principle to the Programme Board.

The Assessment Board met at the end of each academic year and had the same membership as the Programme Board with the exception of the external co-optees. It was responsible for formal approval of all the marks awarded to students participating in the programme, the requirements for re-sits and re-submissions and for review of the assessment procedures.

The Module Assessment and Development Groups were established in November 1990 and normally met once a term. They consisted of the moderator and all staff teaching the module in all participating colleges. One of the tutors acted as the convenor of the group. They were responsible for support and guidance to new tutors, the timetable and format of moderation, development of the definitive

module description and assessment arrangements, and reports to the Programme and Assessment Boards.

As the number of students, modules and participating institutions increased, along with a wish to include other forms of Access programme, the structure had become increasingly unwieldy. A full review was conducted at the end of the 1990–91 academic year and a new structure was being discussed to be presented to the ACRG at a later date.

The AVA received no financial support from the local education authority; the cost of administration and the secretariat was borne by the polytechnic through the Access Co-ordinator and support staff. College co-ordinators had some remission of time to attend meetings and carry out administrative functions, although this varied between colleges. No fees were charged to the colleges; the polytechnic paid the moderators, and students contributed £2.50 per module to the cost of moderation (this arrangement was in place before approval by the ACRG). Funding was a major issue within the review.

What is a course?

As indicated above, the HEFC was a large modular programme and the agreement with the ACRG was that students would be awarded a kitemarked certificate if they passed three modules. The combination was not specified: this was a matter for the tutor to agree with the student in the light of the desired progression route. There was however an issue about the difference in the level of some modules: most were equivalent to A-level but three (quantitative methods, English language and modern languages) were closer to GCSE standard. However, the documentation for each module was required to specify the type of higher education programme for which it prepared students. So, for example, it was made clear that the modern languages module would not prepare a student for a modern languages degree but would be appropriate for a degree in which the language element was a supplementary study, such as many programmes in business studies. Although not written down, the possibility of students expecting or receiving a kitemarked certificate for passing three modules all at the lower level was excluded by the advice and guidance system.

The anomaly of level for these three modules was part of a review conducted by an assessment working party. Although the AVA was not authorised to validate courses outside the framework of the HEFP, some set packages of modules were approved: for example, an Access to information science package based on six half-modules was validated. The AVA planned to prepare a proposal to the ACRG in order that other types of Access programmes could be validated. In the

meantime, a request to validate a Youth Access programme had been approved in principle by the ACRG.

Assessment

The assessment of modules was not standardised. Regulations were different in different subject areas: some had no examinations; some had as much as 70 per cent of the overall marks based on examinations. However, there was a common framework for the final grading of modules: pass – 40 per cent; merit – 50 per cent; credit – 60 per cent; and distinction – 70 per cent plus. In order to receive a kitemarked certificate students had to achieve a pass in three modules. There were some reservations about this system as it encouraged admissions tutors to offer places at higher level passes, along the lines of A-level. It also meant that the AVA was involved in double certification – one certificate (possibly for each module if they were completed at different times) which showed the grades and one which was kitemarked which did not. However, there was also a wish to retain a means of distinguishing between different levels of achievement so that students were able to demonstrate their full strengths. An assessment working party was set up to review the assessment regulations for all the modules and to develop a policy and general guidelines while retaining the diversity appropriate for different subjects and different conventions in higher education.

External moderators and external examiners

A moderator was appointed for each module, working across all the institutions offering that module. This individual combined the function of external examiner as defined by the ACRG with curriculum support and advice. The moderator was a member of the polytechnic staff, often the person who had worked with the tutors to develop the curriculum. This was necessary for the award of the polytechnic certificate, important in raising the credibility and currency of the award in the institution, and in raising the level of knowledge, understanding and involvement in the programme among polytechnic staff. Externality as defined by the ACRG was not a feature of the scheme and the AVA argued that to add another external moderator was beyond the current resources of the AVA. The horizontal function of moderation, related to coherence, integration and the quality of the whole experience of the students, was the responsibility of the providing institution.

A key element of the moderation process was the Module Assessment and Development Group, chaired by one of the tutors, consisting

of the moderator and all the tutors teaching the module across the consortium. It met three times a year as the forum for curriculum and assessment development, for discussion of common examination papers and assessment criteria, and for support and guidance to tutors new to the module. This was a new arrangement and had not yet operated for a full year.

Review of AVA procedures

The structure of the AVA was designed to provide practitioners with the opportunity to raise issues of concern to them through the subject tutor groups and for the programme as a whole through the college co-ordinators group. In more formal terms, the locus of authority for the AVA was the Academic Board of the polytechnic, for which a triennial report on the programme was required and was due at the end of the first year of operation as an AVA. A complete review of the structure, resources and procedures as well as the curriculum and institutional developments was therefore undertaken and a development plan prepared.

SOUTH WEST ACCESS VALIDATING AGENCY (SWAVA)

Background

SWAVA covered Cornwall, Devon and parts of Somerset and Dorset. In 1986 there were only four Access Courses in the region; by 1990 there were 28. In July 1987, the South West Access to Higher Education Monitoring Group was set up to encourage the development of Access Courses, to provide a quality control service and to make recommendations on the suitability of these courses for mature students wishing to enter higher education. This monitoring group formed the basis of SWAVA, as approved by the ACRG.

Purposes and functions

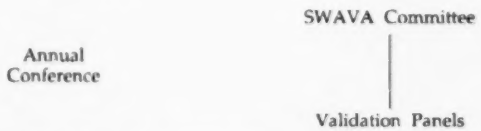
The AVA had four key functions:

- ☐ validation of Access to higher education courses in the area
- ☐ certification of students who have completed a validated course
- ☐ support and encouragement for the further development of Access to higher education
- ☐ advice to higher education institutions on the quality of Access Courses in the region.

In addition, staff development was seen as an essential element and the AVA sought 'to encourage appropriate staff development and consultative meetings'.

During the first four terms up to July 1991 in which SWAVA operated, it reviewed and validated 25 courses. It was, however, essentially reactive – it did not formally and actively promote the development of provision, although most members of the main committee saw this as part of their institutional role and responsibility. Support was given to any course tutors seeking to develop courses or to obtain validation of existing courses. Advice to higher education institutions on the quality of courses was also provided largely by the members in their individual roles and responsibilities, although the AVA produced a formal list once a year of approved courses which was sent to the academic registrar or admissions officer of establishments of higher education in the region. The AVA held only one conference for tutors in its own right but supported and encouraged institutional staff development events and was supporting and liaising with the newly emerging FAST network in the region to explore ways of working together. Members recognised that there were large needs in the area for staff development for Access-related work but saw it as 'largely a college responsibility'. Resources for staff development to meet the needs of the AVA were very limited. The guiding principle of the AVA was 'lightness of touch' and the aim was to achieve the maximum rigour with the minimum of bureaucracy.

Structure and funding



The structure of the AVA was very simple. The annual conference was new; it was agreed in July 1991 and was to take place for the first time in the 1991–92 academic year.

The main committee met three times a year and consisted of representatives from the polytechnic (three), the university (three), other higher education institutions (four) and non-higher education institutions (four: three further education and one local authority adviser) in the region. The imbalance between higher education and further education arose from the fact that four of the higher education institutions were themselves significant providers of Access Courses so that the balance between providers and receivers was more even.

Plans were in hand, however, to increase the representation of the further education sector.

The Chair was the Access Co-ordinator from the university and the Secretary held the same post in the polytechnic. The positions were held for three years and the roles rotated to other members of the committee at the end of 1991–92. It was agreed that these posts should be filled a year ahead of time and that one should be from higher education and the other from further education, serving alongside the existing Chair and Secretary for the year. This was designed to provide experience, share the workload and enable the existing Chair and Secretary to prepare for the review by the ACRG. The overlap of one year was to be a regular feature of the change in roles.

SWAVA received no funding from local education authorities nor any cash funding other than validation and review fees. Fees were paid in September each year. The fees for the 1990–91 academic year were: for new courses an initial validation fee of £200 with a subsequent annual fee of £100 per centre; for courses already validated under the previous arrangements £100 for a review at the transition stage and a subsequent annual fee of £100. On a discretionary basis, courses which had no means of finance other than student fee income could, in cases of hardship, have validation fees waived. This was intended to protect adult education and open learning centre courses if necessary but was not used, as all courses paid the fees. Fees were used to offset travel expenses for panel members (if they could not be met by their institution), production of certificates, stationery and other minor administrative costs. The administrative and clerical support was provided mostly by the polytechnic where the Secretary was based, at no charge to the AVA. The accounting function was also provided by the polytechnic at no charge to the AVA, but this meant that the AVA was required to charge VAT on the validation fees. Meetings were held at member institutions on a rotating basis and panels were held at the providing institution. The external examiners were paid by the providers; moderators were not paid – their services were provided as part of the role of committee member.

During the third term of operation as an AVA, a 0.1 contribution towards a clerical post at the polytechnic was made from existing funds to help service the committees and panels. For 1991–92 fees were increased to £250 per annum and a registration fee of £100 was introduced, payable when courses formally requested validation. This was expected to provide enough income to fund a 0.5 post to support the work associated with new courses and the annual reporting functions. It was hoped that the 0.5 would be part of the Development Officer post for the newly-emerging open college.

What is a course?

SWAVA validated a range of different Access arrangements, although all were multi-exit. The Access programme at the university was offered in several different centres; in one college a large modular programme was validated; in one, newly designated community college the Access Course included some modules from a new A-level programme; courses based in some rural centres included significant elements of distance and open learning; in some colleges discrete Access Courses were offered. When existing Access principles were challenged by new arrangements (for example, the use of A-level modules), these were the subject of lengthy discussion at the main committee.

Assessment

Assessment requirements were loosely defined by the AVA, although it was expected that both continuous assessment and examinations would be included and portfolio assessment was encouraged. Marking criteria were not always made explicit or scrutinised at the validation stage; this was often more a matter for external examiners, who were charged with approving the standards achieved by the students. There was, however, a common framework for the final grading of the students involving two levels of pass performance: pass with merit and pass. The former was a higher level of pass indicating a capability of benefiting from higher education and the latter indicating successful completion of the course but not necessarily capable of benefiting from a degree-level programme in higher education. Only students who achieved the pass with merit were awarded the kitemarked certificate; those with a pass received a college certificate. This system was very popular with course tutors who believed it provided the opportunity to certificate students who would otherwise leave with nothing (those with a pass overall). However, it increasingly caused problems with admissions tutors who made offers to students conditional on a pass, and this was felt to be misleading as such students were not thought likely to succeed in degree-level work. There was therefore an intention to review the system.

External moderators and external examiners

All courses were required to have an external examiner whose prime focus was the external examiner role as defined by the ACRG but who was also concerned with the quality of the course as a whole and involved in curriculum advice. These were all drawn from higher education and most, although not all, from institutions within the

consortium. A list of staff in all member institutions, including further education, who were experienced, appropriate and willing to act as examiners was being compiled for new courses. In addition, each course had a moderator who was the member of the main committee and who acted as chair of the validation panel for the course. The role of the moderator was to act as the link person between the course and the AVA, to advise on regulations and requirements in the preparation of the course submission and, arising out of validation, to ensure that any conditions and recommendations were met, to advise on action required if changes were made to the course, to disseminate good practice and to be a channel of communication from the course to the committee. This was a new arrangement and the distribution of courses among members of the committee was uneven. It was not clear whether this system would be manageable if the increase in the number of courses continued.

Review of AVA procedures

An annual evaluation report was prepared by the chair for the main committee, addressing the aims and objectives of the AVA, the extent to which these had been achieved and the means used to address them. In addition, members of the committee were expected to report issues arising from the field and bring them to the attention of the committee as they arose. Feedback from practitioners was obtained at staff development events and was to be the main purpose of the annual conference. SWAVA was to be the first AVA to be reviewed by the ACRG.

appendix iv

Membership of the Steering Committeé for the Evaluation Study

Dr Adrian Seville	City University (Chair)
Ms Ros Seyd	Training Agency (now Training, Enterprise and Education Directorate, Department of Employment)
Mr Martin Johnson	Further Education Unit
Ms Anne Barlow	Department of Education and Science (now Department for Education)
Mr Stephen McNair	Unit for the Development of Adult Continuing Education (now merged into the Further Education Unit)
Professor Chris Duke	University of Warwick
Ms Maria Slowey	Newcastle Polytechnic (now the University of Northumbria at Newcastle)
Ms Brenda Remington	South East Derbyshire College
Ms Ann Owen	Stourbridge College of Technology and Art
Ms Sue Pedder	London Open College Federation

In attendance

Dr Philip Jones	Access Courses Recognition Group
Mr Malcolm Deere	Access Courses Recognition Group
Mr Gareth Parry	City University
Ms Pat Davies	City University

References

ACRG (1991) *Response to the White Paper on Education and Training for the 21st Century.*

ACRG (1992) *A Framework for Periodic Review of Authorised Validating Agencies (AVAs).*

CDP, CVCP and SCOP (1992) *A New Quality Assurance Organisation for Higher Education.* Report on progress to the DES, March 1992.

CNAA (1990) *A survey of Access Courses to Higher Education: Analysis and prospects,* CNAA Briefing Paper 22. London: CNAA.

CVCP and CNAA (1989a) *Access Courses to Higher Education. A framework of national arrangements for recognition.* London: CNAA.

CVCP and CNAA (1989b) *Access Courses to Higher Education. A framework of national arrangements for recognition (2). Procedures for the approval of Authorised Validating Agencies and an invitation to apply.* London: CNAA.

CVCP and CNAA (1990a) *Access Courses to Higher Education. A framework of national arrangements for recognition (3). Progress report from the Access Courses Recognition Group.* London: CNAA.

CVCP and CNAA (1990b) *Access Courses to Higher Education. A framework of national arrangements for recognition (4). The Access Courses Recognition Group: advice and progress report.* London: CNAA.

CVCP and CNAA (1992a) *Access Courses to Higher Education. A consolidated bulletin on the framework of national arrangements for the recognition of Access Courses in England, Wales and Northern Ireland.* London: CNAA.

CVCP and CNAA (1992b) *Register of Recognised Access Courses to Higher Education. Access Courses to Higher Education Framework of National Arrangements for Recognition.* London: CNAA.

DAVIES, P. and PARRY, G. (1992) 'Central intentions and local interpretations: implementing national arrangements for the recognition of Access Courses', *Journal of Access Studies,* 7 (1) 42–60.

DES (1978) 'Special courses in preparation for entry to higher education', Letter to Chief Education Officers, 2 August 1978.

DES (1985) *Academic Validation in Public Sector Higher Education: The Report of the Committee of Enquiry into the Academic Validation of Degree Courses in Public Section Higher Education*, Cmnd. 9501. London: HMSO.

DES (1987a) *Higher Education. Meeting the Challenge*, Cm 114. London: HMSO.

DES (1987b) Letter of invitation to the CNAA, 13 November 1987.

DES (1989) Letter of invitation to the CNAA, 12 April 1989.

DES (1990) *Report of the Review of the Council for National Academic Awards*. London: HMSO.

DES (1991) *Higher Education. A New Framework*, Cm 1541. London: HMSO.

DES, Department of Employment and Welsh Office (1991) *Education and Training for the 21st Century*, Cm 1536 Volume I and II. London: HMSO.

DFE (1992a) 'Approval of Vocational Qualifications and HE Access Courses under the FHE Act 1992', Letter to principals of colleges in the new further education sector, 10 August 1992.

DFE (1992b) 'Developments in course provision: access courses, foundation years, franchising and semester organisation', Letter to local education authorities and institutions of higher education in the United Kingdom, 19 August 1992.

ECCTIS (1989) *Access to Higher Education Courses Directory*. Milton Keynes: ECCTIS in co-operation with CNAA and FAST.

ELLIOT, K. (1992) 'The Wales framework for Access', *Journal of Access Studies*, 7 (1) 69–82.

HER MAJESTY'S INSPECTORATE (1993) *Scottish Wider Access Programme: A Preparation for Higher Education. A Report by HM Inspectors of Schools*. Edinburgh: Scottish Office Education Department.

HIGHER EDUCATION FUNDING COUNCIL ENGLAND (1992) *Non-formula Funding*. Bristol: HEFCE.

LEWIS, R. (1989) 'The recognition of Access Courses to higher education: a perspective from CNAA', *Journal of Access Studies*, 4 (1/2) 15–24.

MILLINS, P.K.C. (1984) *Access Studies to Higher Education (September 1979 – December 1983): A Report*. London: Roehampton Institute of Higher Education.

PARRY, G. and DAVIES, P. (1991a) *Framing Access. The Interim Report of the Evaluation Study of the National Framework for the Recognition of Access Courses*. Leicester: UDACE.

PARRY, G. and DAVIES, P. (1991b) 'The National Framework Evaluation Study: some issues from the first report', *Journal of Access Studies*, 6 (1) 65–71.

PARRY, G. and DAVIES, P. (1991c) 'Paper and people', *Adults Learning*, 2 (6) 174–175.

PARRY, G. and DAVIES, P. (1992) *Kitemarking Access. Some observations on the introduction of a national framework for the recognition of Access Courses*. London: FEU.

SILVER, H. (1990) *A Higher Education. The Council for National Academic Awards and British Higher Education 1964–1989*. Basingstoke: Falmer.

YATES, J. and DAVIES, P. (1987) *The Progress and Performance of Former Access Students in Higher Education: Final Report*. London: Roehampton Institute of Higher Education.

the attempt to develop at national level a set of principles and relationships drawn from access practice at local level, and then to offer them back to the field as part of a regulatory framework, has had a number of consequences, not all of them anticipated by those who devised and administered the scheme.'

This study of the evolution and operation of the national framework for the recognition of Access Courses is concerned with two major themes: the elaboration by the central authorities of the principles and procedures which were to guide the scheme; and the interpretation of these precepts and protocols by the local agencies authorised to validate Access Courses.

The authors were granted full access to the meetings and papers of the central body, and fieldwork was conducted over a period of twelve months in different parts of England. Their findings illustrate the competing pressures operating within and towards the framework as well as the tensions, ambiguities and uncertainties which accompanied the formation and implementation of the enterprise.

A broad approach to evaluation and a collaborative style of research have contributed to a rich source of information about a significant episode in the history of access education in Britain.

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ISBN 1 872941 39 8

Published by the National Institute of Adult Continuing Education,
19B De Montfort Street, Leicester LE1 7GE

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